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November 28, 1988

MS. ANN C. TIGHE
COTSIRILOS, CROWLEY,
STEPHENSON, TIGHE & STREICKER, LTD.
33 North Dearborn Street, Suite 930
Chicago, Illinois 60602

In Re: U.S. EPA vs. U.S. Scrap Corp. and 9th Avenue Dump
Case No: -
Deposition of: Steve Martell

Dear Ms. Tighe:

Enclosed is your copy of the transcript of the above-captioned deposition taken on November 21, 1988. Signature of the witness was reserved, and it was agreed between counsel at the deposition that our office would send you the errata sheets and signature page for you to obtain signature of the witness.

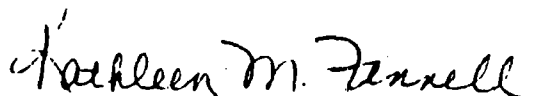
Please instruct the witness to read his (her) deposition and make any and all corrections on the errata sheets that I am enclosing at the back of the transcript. He must sign the errata sheet(s) and the signature page before a Notary Public within 30 days.

Please forward a copy of the errata sheets and signature page to all counsel of record and myself at the above address.

If you have any questions regarding signature, please call me at the above telephone number. Thank you for your cooperation in this matter.

Very truly yours,

BAKER, FENNELL & ASSOCIATES, INC.


Kathleen M. Fennell

KMF/jmc

cc: Mr. Edward Kowalski✓

Baker, Fennell & Associates, Inc.

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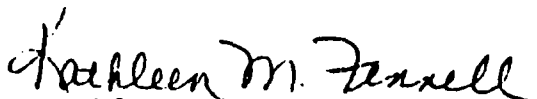
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Kathleen M. Fennell

KMF/jmc

cc: Mr. Edward Kowalski✓

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

In Re the Matter of:)
)
U.S. SCRAP CORPORATION)
Chicago, Illinois)
)
and)
)
9th AVENUE DUMP)
Gary, Indiana)

The discovery deposition of STEVE
MARTELL, taken in the above-entitled cause, before
Lisa Elenz, C.S.R., a Notary Public within and for
the County of Cook and State of Illinois at 33
North Dearborn Street, Chicago, Illinois, on
November 21, 1988, at the hour of 2:00 o'clock
p.m.

BAKER, FENNELL & ASSOCIATES, INC.

318 W. RANDOLPH ST., SUITE 400
CHICAGO, ILLINOIS 60606
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REPORTED BY: Lisa Elenz CSR, RPR

1 **APPEARANCES:**

2 **UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

3 **BY: MR. EDWARD J. KOWALSKI**

4 **MR. MARK THOMAS and MS. ALLISON HILTNER**

5 **230 South Dearborn Street**

6 **Chicago, Illinois 60604**

7 **(312) 353-2094.**

8 **Appeared on behalf of the Plaintiff.**

9 **COTSIRILOS, CROWLEY, STEPHENSON, TIGHE &**
 10 **STREICKER, LTD.**

11 **BY: MS. ANN C. TIGHE**

12 **33 North Dearborn Street**

13 **Chicago, Illinois 60601**

14 **(312) 263-0345**

15 **Appeared on behalf of Mr. Steve Martell.**

16 **McANDREWS, HELD & MALLOY P.C.**

17 **BY: MR. GERGORY J. VOGLER**

18 **70 West Madison Street, Suite 1400**

19 **Chicago, Illinois 60602**

20 **(312) 332-5544**

21 **Appeared on behalf of Mr. Steve Martell.**

22 **I N D E X**

23 **EXAMINATIONS**

24 **PAGE**

25 **WITNESS: STEVE MARTELL**

26 **Examination by Mr. Kowalski**

27 **4-120**

28 **E X H I B I T S**

29 **No. 1**

30 **10**

(Witness sworn.)

MR. KOWALSKI: For the record, this will be the deposition of Steve Martell, taken pursuant to a subpoena issued under the authority of Section 122 E-3 B of the Comprehensive Environmental Response Compensation and Liability Act as amended by the Super Fund Amendments through the Authorization Act.

I'd also like to put on the record that in addition to the people present at the deposition today, I notified the potentially responsible party steering committee for this case that the deposition of Mr. Martell would be taken today and tomorrow. And responding to an earlier request by the committee, I offered them an opportunity to have a representative present and to submit questions to be asked during the deposition. I was contacted this morning by Mr. Jeffery Teitel, T-e-i-t-e-l, and was informed that the steering committee would not have a representative present today or submit any questions to be asked.

Mr. Martell, I'm going to be asking you some questions today regarding two sites. One I'll term the 9th Avenue dump site, and that's located approximately 9th Avenue and Kline, in Gary,

1 Indiana. Okay?

2 THE WITNESS: Uh-huh.

3 MR. KOWALSKI: The other site I will ask you
4 about I will term the "U.S. Scrap site." I know you
5 sometimes term the "elevator site," and that's
6 located at approximately 122nd and Cottage Grove
7 Avenue in Chicago.

8 THE WITNESS: Right.

9 MR. KOWALSKI: The court reporter will be
10 taking your testimony down, so I ask that you keep
11 all of your answers out loud. All right?

12 THE WITNESS: Okay.

13 MR. KOWALSKI: The other thing is, if you need
14 to take a break or anything, or if you have any
15 questions, let me know, and we'll be happy to take a
16 break or answer any questions you have before
17 continuing. Okay?

18 THE WITNESS: Okay.

19 STEVE MARTELL,
20 after having been first duly sworn, was examined and
21 testified as follows:

22 EXAMINATION

23 BY MR. KOWALSKI:

24 Q Mr. Martell, can you give me the timeframe

1 at which the 9th Avenue dump site accepted waste, to
2 the best of your knowledge?

3 A Can we stop for a second?

4 MR. KOWALSKI: Off the record for a moment.

5 (Discussion held off the record.)

6 MR. KOWALSKI: Could you read it back?

7 (Record read.)

8 BY THE WITNESS:

9 A I bought the 9th Avenue Site in two
10 purchases. The first part in 1970, approximately
11 June; second part, 1971 in June. And to the best of
12 my recollection, U.S. Scrap started to dump, I'm
13 going to say, oh, early '73, and that's a guess.
14 And then it went all the way to the end of '75, U.S.
15 Scrap used that place.

16 Q When you say U.S. Scrap used it, you're
17 referring to U.S. Scrap Corporation?

18 A Corporation, yes, sir.

19 Q And the U.S. Scrap site or the elevator
20 site, what were the dates of dumping out at that
21 site?

22 A At the elevator?

23 Q Yes.

24 A The U.S. Scrap site, as you call it. That

1 would be from, let's see, 1965, sometime in 1965
2 until sometime around the end of 1973.

3 Q Mr. Martell, you were involved with the
4 operations of running those two sites, correct?

5 A Right.

6 Q So you have knowledge regarding the daily
7 operations at those two sites?

8 A More or less.

9 Q So your testimony is based in part upon
10 that personal experience?

11 A Yes, it is.

12 Q Now, you provided a transcribed statement
13 earlier in May of this year during which time we
14 went over various companies who were customers and
15 delivered waste to those two sites. Do you remember
16 that?

17 A Yes, I do.

18 Q And prior to giving that statement, did you
19 do some kind of preparation or do some kind of
20 investigation to obtain additional information for
21 that statement?

22 A What I did is, as it got closer to this
23 year, and on the advice of my attorney here, Ann,
24 she suggested that I start trying to remember as

1 much as I could about who the customers were of U.S.
2 Scrap through the years.

3 So then as I remember a name, I'd
4 put it down. Then I'd try to remember the years and
5 that. And, also, I had, like, little notes here and
6 there that I was able to take some information off
7 of.

8 And then later on, I knew that the
9 one place where I could clarify everything would be
10 the Illinois Manufacturers Directory. And we tried
11 calling the Illinois Manufacturers Directory
12 Company, and they says they didn't have any old
13 ones, but they suggested we go to the Chicago Public
14 Library, and I was fortunate enough to find all the
15 copies there except one year, 1969.

16 So between that and all my notes
17 and my memory and talking to drivers and some notes
18 and some lists provided by Ann, wherever she got
19 them from, my attorney, I was able to compile this
20 list here.

21 Q Okay.

22 MS. TIGHE: Just to clarify, any notes that I
23 gave to you, Mr. Martell, were records of U.S. Scrap
24 Company, is that right?

1 BY THE WITNESS:

2 A Right.

3 BY MR. KOWALSKI:

4 Q And did you do any additional work since
5 your May statement in preparation for today's
6 deposition?

7 A Very much.

8 Q What did you do for that?

9 A Well, I straightened out more of the
10 timeframe on some of the people and some of the
11 customers, and I got the addresses, the original
12 address, of where everything was picked up because,
13 in all those years, many of those companies aren't
14 there anymore in that location, some are out of
15 business or some have moved. But whenever I made
16 the list out, I would try to put down the address of
17 where the material generated from at the time it was
18 generated.

19 Q Mr. Martell, I am going to start with your
20 original statement given in May of 1988 and go
21 through those companies again. And I will be asking
22 you, largely, many of the same questions, and I will
23 also be asking you if any of the information you
24 gave at that time has changed as a result of your

1 additional investigation. Okay?

2 A Okay.

3 Q Do you know whether A.E. Staley disposed of
4 waste at the U.S. Scrap site?

5 A Yes, they did.

6 Q And do you know whether they disposed of
7 waste at the 9th Avenue dump site?

8 A Yes, they did, to the best of my knowledge.

9 Q And let me mention something about that.
10 If at any time during any of the questions you don't
11 recall, or you believe you recall but you're not
12 sure, please let me know that.

13 A I will.

14 Q Otherwise, I'll assume that you recall.

15 Can you tell me the address of the
16 facility that disposed of waste at the U.S. Scrap
17 and 9th Avenue sites?

18 A It's Maley, M-a-l-e-y, Road, in Lemont,
19 Illinois.

20 Q And what was the time period that A.E.
21 Staley's waste was disposed of at the U.S. Scrap and
22 9th Avenue sites?

23 A To the best I can remember, it's somewhere
24 between 1972 to 1975. The 1975 part is for sure.

1 Q And when you say it's for sure, why is
2 that?

3 A Because it's on one of the customer lists,
4 on one of the ledger sheets.

5 MR. KOWALSKI: Could you mark this Martell No.
6 1?

7 (Whereupon Martell Deposition
8 Exhibit No. 1 was marked for
9 identification.)

10 BY MR. KOWALSKI:

11 Q Mr. Martell, I am going to show you an
12 exhibit marked your deposition Exhibit No. 1 for
13 identification, which consists of 16-pages of what
14 appear to be account ledger sheets. The first page
15 apparently having written at the top "spot tank to
16 load now cost \$35," and then what appears to be "D.
17 Head." The last page is dated in the upper
18 right-hand corner, "April 30, 1975." I am going to
19 ask you if that's the document you were referring to
20 to confirm the 1975 date for A.E. Staley.

21 A Yes, it is. And, incidentally, that's my
22 handwriting on top, just the top, though.

23 Q Do you know when you put that handwriting
24 on top of that first sheet?

1 A No, but -- I wouldn't know exactly when,
2 but that meant that there was no free delivering a
3 tanker to your factory to sit there for you to put
4 waste in. You have to pay for that dry run, as we
5 would call it.

6 Q Would that notation by you have been made
7 in connection with U.S. Scrap Corporation's business
8 operations?

9 A Yes, it would.

10 Q Were these 16 pages of ledger sheets used
11 in connection with U.S. Scrap's every-day business
12 operations?

13 A Yes, they were.

14 Q Do you know what kind of waste A.E. Staley
15 had delivered to the 9th Avenue dump and U.S. Scrap
16 site?

17 A I believe it was polymers and some sort of
18 chemicals.

19 Q Do you know how often their waste was
20 delivered to those two sites?

21 A For sure, one, and possibly two, loads of
22 drums, as best as I can remember at this time.

23 Q And how frequently would that be delivered?

24 A I'm not sure.

1 Q Do you recall whether Abbott Laboratories
2 disposed of waste at the U.S. Scrap site?

3 A Yes, they did.

4 Q Do you recall whether Abbott disposed of
5 waste at the 9th Avenue dump site?

6 A Yes, they did.

7 Q Do you recall the address of the facility
8 where Abbott Laboratories generated the waste
9 disposed of at those two sites?

10 A 14th and Sheridan Road, North Chicago,
11 Illinois.

12 Q Do you recall the time period that Abbott
13 Laboratories disposed of waste at those two sites?

14 A About 1965 until some time in 1973.

15 Q And do you recall what kind of waste was
16 disposed of at those two sites by Abbott
17 Laboratories?

18 A It was pharmaceutical and biological
19 chemicals, solvents and acids.

20 Q And do you recall what volume of waste was
21 delivered to those two sites during that time
22 period?

23 A About three to four trailer loads,
24 semitrailer loads, per month. And on this one, I

1 have personal knowledge of handling the drums. I
2 handled Abbott's drums because it was bad stuff.
3 That's why I remember this here.

4 Q So you personally went to Abbott
5 Laboratories and picked up some of that waste?

6 A No, I didn't. I personally unloaded the
7 trailers at the -- for sure at the U.S. Scrap site.
8 I helped unload the trailers and handled the drums.

9 Q Do you recall whether a company called
10 Active Services Company disposed of waste at the
11 U.S. Scrap site?

12 A No, I don't.

13 Q Do you recall whether Active Services
14 Company disposed of waste at the 9th Avenue dump
15 site?

16 A No, I don't.

17 Q Do you recall whether Adolph Plating
18 disposed of waste at the U.S. Scrap site?

19 A No, I don't.

20 Q Do you recall whether Adolph Plating
21 disposed of waste at the 9th Avenue dump site?

22 A No, I don't.

23 Q Do you recall whether Alberto Culver
24 disposed of waste at the U.S. Scrap site?

1 a Yes, they did.

2 Q Do you recall whether Alberto Culver
3 disposed of waste at the 9th Avenue dump site?

4 A Yes, they did.

5 Q Do you recall the address of the facility
6 that disposed of waste at the 9th Avenue dump and
7 U.S. Scrap site?

8 A 2525 Armitage Avenue, Melrose Park,
9 Illinois.

10 Q And do you recall the time period that
11 Alberto Culver would have disposed of that waste at
12 those two sites?

13 A 1973 and 1974.

14 Q Do you recall the nature of the waste that
15 was disposed of by Alberto Culver at the two sites?

16 A Machine wash solvents and oils.

17 Q Do you recall the volume of waste that was
18 disposed of by Alberto Culver at those two sites?

19 A It was 2 to 3,000 gallons per month.

20 MS. TIGHE: Pardon me. Let me clarify. Is
21 that -- Do you mean 2,000 to 3,000 gallons per
22 month?

23 BY THE WITNESS:

24 A It would be 2,000 to 3,000 gallons per

1 month.

2 MS. TIGHE: That's what I said. Thank you.

3 BY MR. KOWALSKI:

4 Q Mr. Martell, do you recall whether Alton
5 Boxboard Company disposed of any waste at the time
6 U.S. Scrap site?

7 A Yes, they did.

8 Q Do you recall whether Alton Boxboard
9 Company disposed of any waste at the 9th Avenue dump
10 site?

11 A No, they did not.

12 Q Do you recall the address of the facility
13 that disposed of waste at the U.S. Scrap site?

14 A 5025 West 65th Street, Bedford Park,
15 Illinois.

16 Q Was there only one facility that disposed
17 of waste at the U.S. Scrap site?

18 A I'm a little hazy on that, but there's
19 another facility not very far from the first one,
20 and it's located at 6550 South Lavergne,
21 L-a-v-e-r-g-n-e, and that's also in Bedford Park,
22 Illinois. And that's called the Folding Carton
23 Division.

24 Q When you say you're a little hazy on it.

1 What do you mean by that?

2 A I mean that I remember personally picking
3 up the the drums at the first factory, but I don't
4 remember if we did get drums out of that second
5 factory or not, but for sure out of the first one.

6 Q Do you recall the time period that Alton
7 Boxboard Company disposed of waste at the U.S. Scrap
8 site?

9 A 1965 until some time in 1967.

10 Q And do you recall what kind of waste was
11 disposed of at the U.S. Scrap site?

12 A Paint, ink, solvents and oils.

13 Q And do you recall the volume of waste that
14 was disposed of at that site?

15 A It was just two or three semitrailer loads
16 of drums in the entirety, it was all totaled.

17 Q I notice that in your original statement in
18 May you said two or three trailer loads of drums a
19 year. Has your recollection changed since that
20 original statement?

21 A Let's see. There's two years involved, so
22 it's -- No. I think it's changed where I still
23 think it wasn't that much. It was only two or three
24 trailer loads all totaled. And the way I got at

1 that is I know there's an instance where we backed
2 up and that was when I was there where we took a
3 whole load, but other times the chemicals or paints
4 or whatever they were were in the garbage which we
5 were also hauling at the time, the solid waste. So
6 I would say it would add up to two or three
7 semitrailer loads of drums altogether.

8 Q Do you recall whether American Can Company
9 disposed of waste at the U.S. Scrap site?

10 A Yes, they did.

11 Q And do you recall whether American Can
12 Company disposed of waste at the 9th Avenue dump
13 site?

14 A Yes, they did.

15 Q Do you recall the address of the facility
16 that disposed of waste at those two sites?

17 A Well, there's four plants, and these are
18 the addresses, they call it the Englewood facility.
19 It's at 6017 South Western Avenue in Chicago.

20 Second one is the Maywood plant,
21 which blew up. It's not there anymore, 9th Avenue
22 and St. Charles Road, Maywood, Illinois.

23 The next one is the Hammond plant
24 at 165th Street, and I don't know the other street

1 in Hammond, Indiana.

2 The fourth one is in Barrington,
3 Illinois, and it's 433 North Northwest Highway,
4 Barrington, Illinois.

5 Q Beginning with the Englewood facility, do
6 you recall the time period that its waste were
7 disposed of at the U.S. Scrap, 9th Avenue dump site?

8 A 1965 until 1975.

9 Q And do you recall what kind of waste was
10 disposed of at those two sites out of that facility?

11 A That would be solvents, paints, varnishes,
12 adhesives and oils.

13 Q This would apply to all three factories,
14 probably the last one, that research facility.

15 Q So the waste type was the same for the
16 three facilities except the research facility?

17 A Right. They all did the same thing at each
18 factory.

19 Q And what would be the volume of waste
20 disposed of at the two sites by the Englewood
21 facility?

22 A The Englewood had about four to five
23 semitrailer loads per month, and the Maywood
24 facility would have one or two trailer loads per

1 month, and the Hammond facility would have 40 to 50
2 drums a month, and the Barrington facility, which
3 was a research facility, had 20 to 40 drums, three
4 or four times a year.

5 Q Do you recall what kind of waste was
6 disposed of by the research facility in Barrington?

7 A Not at this time.

8 Q Do you recall the dates at which the
9 Maywood facility disposed of waste at the two sites?

10 A Again, it's a guess, but I believe that the
11 Maywood Facility had their fire sometime in the late
12 60s or early 70s, somewhere in there. I did have
13 that date, but I can't find it.

14 Q When did they begin disposing of waste?

15 A 1965.

16 Q And the Hammond facility, what would be the
17 dates that it disposed of waste at those two sites?

18 A I think we started hauling the Hammond
19 facility about 1968, and that went on until 1975.

20 Q And do you recall the dates, or a
21 timeframe, at which the research facility in
22 Barrington disposed of waste at those two sites?

23 A That would be like from, I'd say, about
24 1970 or '71 to '75, in the 70s.

1 MR. THOMAS: Could you go over the amount again,
2 the frequency?

3 THE WITNESS: What did he say?

4 MR. KOWALSKI: Could you go over -- Strike that.
5 Could you read back his response regarding values?

6 (Record read.)

7 BY MR. KOWALSKI:

8 Q Mr. Martell, do you recall whether American
9 Motor Company disposed of waste at the U.S. Scrap
10 site?

11 A Yes, they did.

12 Q And do you recall whether American Motor
13 Company disposed of waste at the 9th Avenue dump
14 site?

15 A Yes, they did.

16 Q Do you recall the address of the facility
17 that disposed of waste at those two sites?

18 A Only that it's in Kenosha, Wisconsin.

19 Q Do you recall the time period during which
20 American Motor Company disposed of waste at the two
21 sites?

22 A 1971 until 1973.

23 Q Do you recall the waste type that was
24 disposed of at those two sites?

1 A Paints and solvents.

2 Q And do you recall the volume of waste that
3 was disposed of at those two sites by American Motor
4 Company?

5 A As best I can recall, it's four to five
6 trailer loads total, and the trailers held between
7 50 and 70 drums.

8 Q Do you recall whether American Printers
9 disposed of waste at the U.S. Scrap site?

10 A Yes, they did.

11 Q And do you recall whether American Printers
12 disposed of waste at the 9th Avenue dump site?

13 A Yes, they did.

14 Q And do you recall the address of the
15 facility that disposed of waste at those two sites?

16 A 6701 West Oakton Street, Niles, Illinois.

17 Q And do you recall the time period during
18 which American Printers disposed of waste at those
19 two sites?

20 A 1973 until 1975.

21 Q And do you recall the type of waste that
22 was disposed?

23 A It was inks and solvents.

24 Q And do you recall the volume of waste that

1 was disposed of at those two sites?

2 A About every two or three months they would
3 have 25 to 30 drums to be picked up.

4 Q Do you recall whether Apeco, A-p-e-c-o,
5 disposed of waste at the U.S. Scrap site?

6 A Yes, they did.

7 Q Do you recall whether Apeco disposed of
8 waste at the 9th Avenue dump site?

9 A Yes, they did.

10 Q Do you recall the address of the facility
11 that disposed of waste at those two sites?

12 A 2100 Dempster Street, Evanston, Illinois.

13 Q Do you recall the time period during which
14 its waste was disposed of at those two sites?

15 A 1973 until 1975.

16 Q Do you recall the type of waste that was
17 disposed of at those two sites?

18 A Pigments, inks, solvents, oils and
19 chemicals.

20 Q And do you recall the volume of waste that
21 would have been disposed at those two sites by
22 Apeco?

23 A 50 to 60 drums per month.

24 Q Do you recall whether Armour, or Wilson &

1 Company disposed of waste at the U.S. Scrap site?

2 A Yes, they did. And it was Wilson &
3 Company.

4 Q And do you recall whether Wilson & Company
5 disposed of waste at the 9th Avenue dump site?

6 A This particular plant, no, they didn't.

7 Q And do you recall the location of the plant
8 that disposed of waste at the U.S. Scrap site?

9 A Approximately 41st Street and Paulina
10 Avenue, Chicago, Illinois.

11 Q Do you recall the time period during which
12 Wilson & Company's waste was disposed of at U.S.
13 Scrap?

14 A Approximately 1966 until, possibly, 1968.

15 Q And do you recall the type of waste that
16 was disposed of at the U.S. Scrap site?

17 A Rendering sludge.

18 Q When you say "rendering sludge," can you be
19 more specific as to what that would be?

20 A Well, it's from bones. They grind up bones
21 from animals, and they do something with it. And
22 this would be what they can't sell, you know, mixed
23 in with some chemicals, probably.

24 Q Do you know what kind of chemicals would

1 have been mixed in?

2 A No, I don't.

3 Q It was generally animal waste of some kind?

4 A Yes. It would be generally animal waste,
5 right.

6 Q Do you recall the volume of waste that was
7 disposed of at U.S. Scrap by Wilson & Company?

8 A One to two semitrailer loads, in tankers,
9 per week, and the tanker held 4 to 5,000 gallons.

10 Q Do you recall whether Armstrong or Elliott
11 Paint disposed of waste at the U.S. Scrap site?

12 A Yes, they did.

13 Q And do you recall whether they disposed of
14 waste at the 9th Avenue dump site?

15 A Can we stop a minute?

16 MS. TIGHE: Off the record.

17 (Discussion held off the record.)

18 MR. KOWALSKI: Could you read back my last
19 question?

20 (Record read.)

21 BY THE WITNESS:

22 A Let's see now. We started hauling for
23 Elliott Paint, which was not at this address. It
24 was at 4525 West 5th Avenue in Chicago. Elliott

1 then bought Armstrong in 1973 and took over the
2 facility at 1330 South Kilbourn Avenue in Chicago.
3 After 1973, the Armstrong Paint name was dropped and
4 it all became Elliott Paint. And, also, the factory
5 at 5th Avenue was sold or they moved from -- they
6 moved everything over to 1330 South Kilbourn.

7 Q So if I have this straight, U.S. Scrap
8 hailed for Armstrong Paint prior to 1973 at 4525
9 West 5th Avenue?

10 A Right.

11 Q And after 1973, it hauled for Elliott at
12 1330 South Kilbourn in Chicago?

13 A Right. So then, really, 9th Avenue should
14 say "yes."

15 Q So the waste from Armstrong, and then
16 Elliott, went to both U.S. Scrap and 9th Avenue?

17 A Yes, they did.

18 Q Do you know when you started hauling for
19 what was then Armstrong?

20 A Armstrong or Elliott?

21 Q Armstrong was first, right?

22 A No, Elliott was first.

23 Q When did you first start hauling for either
24 of those two companies?

1 A We started hauling for Elliott on 5th
2 Avenue in 1965.

3 Q And when did you stop hauling for either of
4 those two companies?

5 A I am going to say '74 or '75.

6 Q So their waste would have gone to either
7 U.S. Scrap or 9th Avenue between 1965 and 1974 or
8 1975?

9 A That's correct.

10 Q And what was the nature of the waste that
11 was disposed of at those two sites?

12 A Paints, solvents and varnishes.

13 Q And can you tell me the volume of waste
14 that was disposed of at those two sites?

15 A It varied, but it kind of came out to about
16 one to two trailer loads per month.

17 MS. TIGHE: Off the record.

18 (Discussion held off the record.)

19 MR. KOWALSKI: Back on the record.

20 BY MR. KOWALSKI:

21 Q Mr. Martell, off the record you mentioned
22 that, in addition to the one to two trailer loads
23 per month, you recalled some additional hauling for
24 Armstrong or Elliott, is that correct?

1 A Yes. There was some accumulation of drums
2 of chemicals, paints, solvents and varnishes at the
3 1330 Kilbourn plant that, when we did take over, we
4 had to bring that accumulation. Also, there was
5 multiple loads that had nothing do with this one, or
6 two trailer loads a month.

7 Q Do you recall when that accumulation was
8 that you had to dispose of?

9 A I'm not sure, but I'm going to say it's
10 '72, '73, somewhere in there.

11 Q And do you recall how long you had to haul
12 to reduce that backlog or accumulation?

13 A No, I don't. Except that I was at that
14 factory, and I was with those trucks when they
15 started. I actually was at that plant. I know how
16 you back in and where the plant is, what's on the
17 other side of the street, which is nothing. It's
18 all been torn down there. The plant is on the west
19 side of the street.

20 Q Do you recall whether Ashland Chemical
21 Company disposed of waste at the U.S. Scrap site?

22 A Yes, they did.

23 Q Do you recall whether Ashland Chemical
24 Company disposed of waste at the 9th Avenue dump

1 site?

2 A Yes, they did.

3 Q Do you recall the address of the facility
4 that disposed of waste at those two sites?

5 A 142nd and Paxton Road, Calumet City,
6 Illinois.

7 Q Do you recall the time period during which
8 Ashland Chemical disposed of waste at those two
9 sites?

10 A 1969 until 1975.

11 Q Do you recall the type of waste they
12 disposed of?

13 A Chemicals, resins, solvents, glues and
14 adhesives.

15 Q Do you recall the volume of waste that was
16 disposed of at those two sites?

17 A I'd say, like, one to two trailer loads per
18 month, although, at times it didn't work out that
19 way. There would be more. There would be, like, a
20 load a week. But, you know, one to two trailer
21 loads would be a conservative estimate.

22 Q Do you recall whether Barber-Green disposed
23 of waste at the U.S. Scrap site?

24 A Yes, they did.

1 Q And do you recall whether they disposed of
2 waste at the 9th Avenue dump site?

3 A Yes, they did.

4 Q Do you recall the location of the facility
5 that disposed of waste at those two sites?

6 A I just have Aurora, Illinois. I don't have
7 the street address.

8 Q And do you recall the period of time during
9 which they disposed of waste at those two sites?

10 A 1973 until 1975.

11 Q And do you recall the type of waste that
12 was disposed of at those two sites?

13 A Paint, solvents and oils.

14 Q Do you recall the volume of waste that was
15 disposed of at those two sites?

16 A Approximately one trailer load per month.

17 Q Do you recall whether Bagcraft Corporation
18 disposed of waste at the U.S. Scrap site?

19 A Yes, they did.

20 Q And do you recall whether Bagcraft
21 Corporation disposed of waste at the 9th Avenue dump
22 site?

23 A Yes, they did.

24 Q Do you recall the location of the facility

1 that disposed of waste at those two sites?

2 A 3900 West 43rd Street, Chicago, Illinois.

3 Q And do you recall the period of time during
4 which Bagcraft disposed of waste at those two sites?

5 A 1970 until 1975.

6 Q And what was the nature of the wastes that
7 were disposed of at those two sites?

8 A Paint, solvents and adhesives and inks.

9 Q And do you recall the volume of wastes that
10 were disposed of at those two sites?

11 A One trailer load of 50 to 60 drums every
12 two or three months.

13 Q Do you recall whether Barker Chemical
14 disposed of waste at the U.S. Scrap site?

15 A Yes, they did.

16 Q Do you recall whether Barker Chemical
17 disposed of waste at the 9th Avenue dump site?

18 A Yes, they did.

19 Q Do you recall the location of the facility
20 from which Barker Chemical disposed of waste at
21 those two sites?

22 A 700 East 138th Street, Chicago, Illinois.

23 Q Do you recall the time period during which
24 Barker Chemical disposed of waste at the two sites?

1 A 1969 until 1975.

2 Q Do you recall what kind of waste Barker
3 chemical disposed of at the two sites?

4 A Solvents, chemicals and paints.

5 Q And what was the volume of waste disposed
6 of at those sites?

7 A One to two semitrailer loads a month. At
8 times, again, more, but on an even pattern; this is
9 about where it was.

10 Q Do you recall Barrett Varnish Company
11 disposing of waste at the U.S. Scrap site?

12 A Yes, they did.

13 Q And do you know whether Barrett Varnish
14 Company disposed of waste at the 9th Avenue dump
15 site?

16 A Yes, they did.

17 Q Do you recall the location of the facility
18 from which Barrett Varnish Company generated wastes
19 that were disposed of at those two sites?

20 A 1532 South 50th Court, Cicero, Illinois.

21 Q And do you recall the time period during
22 which wastes were disposed of at the two sites?

23 A 1972 until 1975.

24 Q Do you recall what kind of wastes were

1 disposed of?

2 A Varnishes and solvents.

3 Q And do you recall the volume?

4 A 30 to 50 drums, three to four times per
5 year.

6 Q Do you recall whether Benjamin Moore
7 Company disposed of waste at the U.S. Scrap site?

8 A Yes, they did.

9 Q Do you recall whether Benjamin Moore
10 Company disposed of waste at the 9th Avenue dump
11 site?

12 A Yes, they did.

13 Q Do you recall the location of the facility
14 that disposed of waste at the two sites?

15 A North Avenue and 25th Avenue, Melrose Park,
16 Illinois.

17 Q And what was the time period during which
18 Benjamin Moore disposed of waste at the two sites?

19 A 1968 until 1975.

20 Q Do you recall what kind of waste was
21 disposed of at the two sites?

22 A Paints, solvents, varnishes, oils and
23 industrial coatings.

24 Q Do you recall the volume of waste that was

1 disposed of at the two sites?

2 A One to two trailer loads every couple of
3 months.

4 Q Do you recall whether Big Ben Chemicals
5 disposed of waste at the U.S. Scrap site?

6 A Yes, they did.

7 MS. TIGHE: Excuse me, Mr. Martell. Can I just
8 ask for clarification on this Benjamin Moore? Do
9 you know whether that was known by some other name?
10 Do you know whether it was known by the name of
11 Technical Coatings?

12 BY THE WITNESS:

13 A Yes, it is. That's a division, and it's,
14 like, next door to it, next plant.

15 MS. TIGHE: Thank you.

16 BY MR. KOWALSKI:

17 Q So there were two separate Benjamin Moore
18 facilities where you would pick up waste?

19 A Yes.

20 Q And those were adjacent to each other?

21 A They were.

22 Q And one went under the name Technical
23 Coatings?

24 A Right.

1 Q Do you recall whether Big Ben Chemicals
2 disposed of waste at the U.S. Scrap site?

3 A Yes, they did.

4 Q Do you recall whether Big Ben Chemicals
5 disposed of waste at the 9th Avenue dump site?

6 A No, they didn't.

7 Q Do you recall the location of the facility
8 that disposed of waste at the U.S. Scrap site?

9 A The original plant was located at 18th
10 Street and LaSalle Street, Chicago, Illinois.

11 Q When you say "original plant," was there
12 another plant?

13 A There was another plant in Willow Springs,
14 and we hauled out of there, too. But that's not on
15 here. And -- But, I mean, this is for this.

16 Q Did you haul waste from the Willow Springs
17 Plant to either U.S. Scrap or 9th Avenue?

18 A Well, for sure U.S. Scrap, but I am not
19 sure about 9th Avenue at this time.

20 Q So you would haul waste from both plants to
21 U.S. Scrap, at least, is that correct?

22 A Right.

23 Q And do you recall the time period during
24 which you hauled waste from Big Ben Chemicals to

1 U.S. Scrap?

2 A From 18th and LaSalle, it was from 1968
3 until 1970.

4 Q And how about Willow Springs?

5 A It would be after that, naturally, but I am
6 not sure of the dates, though. I'd have to go
7 through all the papers again and figure it out.

8 Q Do you recall the type of waste that was
9 disposed of at the U.S. Scrap site?

10 A Chemicals, you know, of some sort, and
11 solvents.

12 Q Do you recall the volume of waste that was
13 disposed of at the U.S. Scrap site?

14 A Three to four trailer loads, three or four
15 times a year. Plus there was a tremendous
16 accumulation because they were moving, and they had
17 a lot of stuff there. And I'd say that was, like,
18 you know, 10, 20-some odd trailer loads of drums
19 that had to be gotten out of there so they could
20 vacate premises for the new -- that rapid transit
21 line went through there.

22 Q Do you recall whether Blaw-Knox disposed of
23 waste at the U.S. Scrap site?

24 A No, they didn't.

1 Q Do you recall whether Blaw-Knox disposed of
2 waste at the 9th Avenue dump site?

3 A Yes, they did.

4 Q Do you recall the location of the facility
5 that disposed of waste at the 9th Avenue dump site?

6 A Chicago Avenue and Railroad Street, East
7 Chicago, Illinois.

8 Q Do you recall the period of time during
9 which Blaw-Knox disposed of waste at that site?

10 A 1973 until 1975.

11 Q Do you recall the nature of the waste?

12 A Foundry sand and molds.

13 Q Mr. Martell, when you say foundry sand and
14 anchor molds, would that be clean sand of some kind?

15 A Oh, no, it's contaminated sand.

16 Q What would it be contaminated with?

17 A Well, in foundries they use chemicals to
18 make the molds. You know, some are used with loose
19 sand, but a lot of them have chemicals that bind the
20 sand together to keep it in its shape or form when
21 they pour that iron, or whatever they're going to
22 pour, inside there. Then when they're through, they
23 discard this here, and we get all the clean up.
24 Plus there's oil mixed in with these loads, too,

1 cutting oils and other kinds of oils.

2 Q Do you recall the volume of foundry sand
3 and anchor molds?

4 A Five to ten truckloads per day.

5 Q Do you recall whether Boyle-Midway disposed
6 of waste at the U.S. Scrap site?

7 A Yes, they did.

8 Q Do you recall whether Boyle-Midway disposed
9 of waste at the 9th Avenue dump site?

10 A Yes, they did.

11 Q Do you recall the location of the facility
12 that disposed of waste at those two sites?

13 A 5151 West 73rd Street, Bedford Park,
14 Illinois.

15 Q And, Mr. Martell, do you know if
16 Boyle-Midway is affiliated with any other company?

17 A They're a division of American Home
18 Products Corporation.

19 Q Do you recall the time period during which
20 Boyle-Midway disposed of waste at the two sites?

21 A 1973 until 1975.

22 Q Do you recall the type of waste that was
23 disposed there?

24 A Solvents and chemicals, insecticides and

1 deodorants.

2 Q And do you recall the quantity of waste
3 that was disposed of?

4 A Fifty to sixty drums every two or three
5 months.

6 Q Do you recall whether Brandenburg Wrecking
7 Company disposed of waste at the U.S. Scrap site?

8 A Yes, they did.

9 Q Do you recall whether Brandenburg Wrecking
10 Company disposed of waste at the 9th Avenue dump
11 site?

12 A No, they didn't.

13 Q Do you recall the location of the facility
14 from which Brandenburg Wrecking Company disposed of
15 waste at the U.S. Scrap site?

16 A Various demolition jobs all over the city
17 of Chicago and suburbs.

18 Q What time period did Brandenburg dispose of
19 waste at the U.S. Scrap site?

20 A 1972, 1973.

21 Q What was the nature of the waste they
22 disposed of at the site?

23 A Building debris, concrete and wood.

24 Q Do you recall any liquids or solvents from

1 Brandenburg Wrecking Company?

2 A No, I don't.

3 Q And do you recall the volume of waste that
4 was disposed of at U.S. Scrap by Brandenburg
5 Wrecking?

6 A Every day, five days a week.

7 Q Do you recall whether Bretford
8 Manufacturing disposed of waste at the U.S. Scrap
9 site?

10 A Yes, they did.

11 Q And do you recall whether they disposed of
12 waste at the 9th Avenue dump site?

13 A Yes, they did.

14 Q Do you recall the location of the facility
15 from which they disposed of waste at those two
16 sites?

17 A 3951 25th Avenue, Schiller Park, Illinois.

18 Q And during what period of time did they
19 dispose of waste at the two sites?

20 A 1973 until 1975.

21 Q And do you recall the type of waste that
22 was disposed of?

23 A Solvents and paints.

24 Q And do you recall the volume of waste that

1 was disposed?

2 A Forty to sixty drums every two or three
3 months.

4 Q Do you recall whether Brightly Galvanized
5 disposed of waste at the U.S. Scrap site?

6 A Yes, they did.

7 Q Do you recall whether Brightly Galvanized
8 disposed of waste at the 9th Avenue dump site?

9 A Yes, they did.

10 Q Do you recall the location of the facility
11 from which they disposed of the waste?

12 A 3330 South Cicero Avenue, Cicero, Illinois.

13 Q And do you recall during what periods of
14 time did they disposed of that waste?

15 A 1971 until 1975.

16 Q And do you recall the type of waste?

17 A Acid.

18 Q And do you recall the volume?

19 A A 4,500-gallon tanker load two or three
20 times a month.

21 Q Do you recall whether Boltmaster disposed
22 of waste at the U.S. Scrap site?

23 A Yes, they did.

24 Q And do you recall whether they disposed of

1 waste at the 9th Avenue dump site?

2 A Yes, they did.

3 Q Do you recall the location from which they
4 disposed of the waste?

5 A 7375 Chestnut Avenue, Franklin Park,
6 Illinois.

7 Q And do you recall the period of time during
8 which they disposed of this waste?

9 A 1973 until 1975.

10 Q And do you recall the type of waste?

11 A Oils and solvents.

12 Q And do you recall the volume of waste?

13 A Forty to fifty drums, two to three times a
14 year.

15 MS. TIGHE: Off the record.

16 (Discussion held off the record.)

17 BY MR. KOWALSKI:

18 Q You remember something on Brightly
19 Galvanized?

20 A Yes, I remember going there for the first
21 load with our, more or less, new vacuum tanker was
22 the first one we had and trying it out. I remember
23 the tank where we put the hoses in to pump this
24 galvanized acid waste out, and I was there the first

1 time.

2 Q Do you recall whether a C.P. Clare disposed
3 of waste at the U.S. Scrap site?

4 A Yes, they did.

5 Q And do you recall whether they disposed of
6 waste at the 9th Avenue dump site?

7 A Yes, they did.

8 Q Do you recall the location of that
9 facility?

10 A 3101 West Pratt Boulevard, Chicago. But
11 that ain't right -- That would be right.

12 Q 3101 West Pratt Boulevard. And you think
13 that's Chicago?

14 A It's Chicago or the next suburb to it.

15 Q And do you recall the time period during
16 which C.P. Clare disposed of waste at those two
17 sites?

18 A 1973 until 1975.

19 Q Do you recall the nature of that waste?

20 A Acid.

21 Q And do you recall the volume?

22 A Fifteen to twenty-five drums, two or three
23 times a year. And that one, I remember a little bit
24 about it because I happened to handle those drums.

1 And Water Boy, we had a guy named "Water Boy," a
2 black guy that dumped the drums, and he said this
3 was really bad stuff. And I went and told Dave to
4 jack the price up because we were handling stuff
5 that wasn't that great, and so for the risks and all
6 the precautions, we should be compensated.

7 Q When you say "Dave," you mean Dave Head?

8 A Dave Head, yes, sir.

9 Q And what was Dave's position in the
10 operations?

11 A Dave would be considered, like, the
12 business manager and also the salesman. He was the
13 man who went and contacted and communicated with the
14 companies or the plant foremen or the plant manager
15 or the purchasing agent, people like that, you know,
16 or if there was complaints, he'd go out and see what
17 was wrong. If these guys backed over something, and
18 these truck drivers do a lot of things. And, any
19 way, he was general business manager for U.S. Scrap.

20 Q From time to time, would you discuss the
21 various accounts with Dave Head?

22 A All the time.

23 Q Were you ever involved in getting new
24 accounts with Dave Head?

1 A Was I involved?

2 Q Yes.

3 A Oh, yeah. I would give him suggestions,
4 and, you know, leads where I would think, because we
5 were trying to make this into a fairly large
6 business. We were trying to make it all the way
7 with the incinerator and dump and everything. We
8 always talked about it. He'd even say, "What do you
9 think; how much should I charge?" And like, for
10 instance, he would say a big company we'd try to
11 get. I says, "Well, what did the guy say?" He
12 says, "He didn't say nothing. He don't tell you
13 nothing. He don't give you inclining. I always
14 give him my standard answer. "Dave, you're the only
15 guy who can make an assessment because you're on the
16 spot." You've got to read that guy and try to see
17 if he's going us baloney or not," because some guys
18 were real cute with trying to get you to work for
19 nothing. So it was up to Dave to try to get some
20 money and try to get the business.

21 Q Water Boy, was a laborer out at the site?

22 A Right.

23 Q Do you recall his real name?

24 A Archie Randall.

1 Q Is he still around the Chicago land area?

2 A I haven't seen him for 15 years. And we
3 have been looking, just for old time sake. He had
4 17 kids, so --

5 Q Do you recall whether C.P. Hall disposed of
6 waste at the U.S. Scrap site?

7 A Yes, they did.

8 Q Do you recall whether C.P. Hall disposed of
9 waste at the 9th Avenue dump site?

10 A Yes, they did.

11 Q Do you recall the location of the facility
12 that disposed of waste at those two sites?

13 A 7300 South Central Avenue, Chicago,
14 Illinois.

15 Q And over what period of time did they
16 dispose of waste at those two sites?

17 A 1973 until 1975.

18 Q And do you recall the nature of the waste?

19 A Acids and chemicals.

20 Q And do you recall the volume of waste that
21 was disposed of at the two sites?

22 A Fifty to seventy drums every two or three
23 months.

24 Q Do you recall whether Cargill, Incorporated

1 disposed of waste at the U.S. Scrap site?

2 A Yes, they did.

3 Q And do you recall whether Cargill disposed
4 of waste at the 9th Avenue dump site?

5 A Yes, they did.

6 Q Do you recall the location of the facility
7 from which they disposed of the waste?

8 A Cottage Avenue and Lake Marion Road,
9 Carpentersville, Illinois.

10 Q And over what period of time did they
11 dispose of the waste?

12 A 1971 until 1975.

13 Q Do you recall the type of the waste?

14 A Resins, solvents and chemicals.

15 Q And do you recall the volume of waste that
16 was disposed of?

17 A Two to three trailer loads of drums per
18 month. And these trailers held, incidentally, about
19 80 drums per load.

20 Q You mentioned earlier smaller drum loads on
21 trailers. Did the capacity of the trailers vary?

22 A Well, before, say, 1971, the trailers were
23 like 32-footers and 35-footers, so that would be
24 like 60 and 70 drums because we kind of couldn't

1 afford them 40-footers. They were pretty expensive
2 then. But after '71 and '72, we started to go into
3 40-footers because it held 80 drums and didn't cost
4 anymore to go down the street with 80 drums or 60
5 drums. So we started phasing out those little
6 trailers.

7 Q Do you recall whether Central Can Company
8 disposed of waste at the U.S. Scrap site?

9 A I don't remember at this time.

10 Q Do you recall whether they disposed of
11 waste at the 9th Avenue dump site?

12 A I don't remember at this time.

13 Q Do you recall whether Central Solvents and
14 Chemicals disposed of waste at the U.S. Scrap site?

15 A Yes, they did.

16 Q Do you recall whether Central Solvents and
17 Chemicals disposed of waste at the 9th Avenue dump
18 site?

19 A No, they didn't.

20 Q Do you recall the location of the facility
21 from which they disposed of the waste at the U.S.
22 Scrap site?

23 A I believe it was, and I think I was there,
24 it's 2540 West Flourney, F-l-o-u-r-n-e-y, Street.

1 Q At your previous statement, Mr. Martell,
2 you gave an address of 4401 West 26th Street. Is
3 there a reason for the change of address?

4 A Yes, because I had been looking the first
5 time around in an old book I had found, and it
6 listed, you know, again, it didn't have none of
7 this, but it showed the current address as 4401 West
8 26th Street.

9 When I went back to the library, I
10 would go back into the years that the so-called load
11 was picked up and look for factory then and this is
12 where the factory was at the time.

13 Q And you have a vague recollection of having
14 been there?

15 A Yes, it's near a railroad overpass near the
16 Eisenhower Expressway and near Western Avenue. I
17 think it's a little west of Western Avenue.

18 Q Do you recall the time period during which
19 Central Solvents and Chemicals disposed of waste at
20 U.S. Scrap?

21 A Just that it was some time somewhere
22 between 1967 and '71.

23 Q And do you recall the type of waste?

24 A Solvents and chemicals.

1 Q And do you recall the volume of waste?

2 A To the best of my recollection, I don't
3 think we picked up more than one or two trailer
4 loads.

5 Q Do you recall whether Chase Products or
6 Chase Brass disposed of waste at the U.S. Scrap
7 site?

8 A I'm not sure at this time.

9 Q Do you recall whether they disposed of
10 waste at the 9th Avenue dump site?

11 A I'm not sure at this time.

12 Q Do you recall whether Chicago Decal
13 disposed of waste at the U.S. Scrap site?

14 A Yes, they did.

15 Q Do you recall whether Chicago Decal
16 disposed of waste at the 9th Avenue dump site?

17 A Yes, they did.

18 Q Do you recall the location of the facility
19 that disposed of waste at those two sites?

20 A 3310 North Elston Avenue, Chicago,
21 Illinois.

22 Q And do you recall the time period during
23 which they disposed of the waste?

24 A 1969 until 1975.

1 Q And do you recall the type of waste?

2 A Solvents, adhesives, inks and paints...

3 Q And do you recall the volume of waste that
4 was disposed of during that time period?

5 A Thirty or forty drums every four, five
6 months.

7 Q Do you recall whether Chicago Name Plate
8 disposed of waste at the U.S. Scrap site?

9 A Yes, they did.

10 Q Do you recall whether Chicago Name Plate
11 disposed of waste at the 9th Avenue dump site?

12 A Yes, they did.

13 Q Do you recall the location of the facility
14 that disposed of that waste?

15 A 1831 West Columbia Avenue, Chicago,
16 Illinois.

17 Q During what period of time was that waste
18 disposed?

19 A 1972 until 1975.

20 Q Do you recall what kind of waste?

21 A It was acids, solvents and paints.

22 Q And do you recall the volume of waste that
23 was disposed?

24 A Forty to sixty drums, three to four times a

1 year.

2 Q Do you recall whether Chicago Northwestern
3 Railroad disposed of waste at the U.S. Scrap site?

4 A Yes, they did.

5 Q Do you recall whether they disposed of
6 waste at the 9th Avenue dump site?

7 A Yes, they did.

8 Q Do you recall the location of the facility
9 that disposed of the waste at those two sites?

10 A This one I'm not certain exactly, but it's
11 either the Northlake or Franklin Park switching
12 yards.

13 Q And do you recall the time period during
14 which that waste was disposed of?

15 A 1973 until 1975.

16 Q Do you recall the type of waste that was
17 disposed?

18 A Diesel fuel.

19 Q And do you recall the volume of waste?

20 A Five to eight tanker loads of 4,000 to
21 5,000 gallons a load per month.

22 Q Do you recall any other details regarding
23 that account?

24 A I'm not sure.

1 Q Do you recall whether Chicago Steel and
2 Wire disposed of waste at the U.S. Scrap sites?

3 A Yes, they did.

4 Q Do you recall whether they disposed of
5 waste at the 9th Avenue dump site?

6 A Yes, they did.

7 Q Do you recall the location of the facility
8 that disposed of those wastes?

9 A 10257 South Torrence Avenue, Chicago,
10 Illinois.

11 Q And during what period of time did they
12 dispose of those wastes?

13 A 1970 until 1975.

14 Q Do you recall the type of waste?

15 A Acid.

16 Q And what was the volume of waste disposed
17 of?

18 A Four to 5,000 gallons per month. And this
19 is one that I have a little personal knowledge of
20 because these people were nothing but grief. You
21 know, you have to toe the line and do everything the
22 way they wanted. They didn't pay a lot of money
23 for all this fancy service, and you had to send all
24 kinds of helpers in, not all kinds, but two or three

1 laborers in with your driver to go do their work
2 that their own people should have done. So we were
3 constantly made aware of this problem all the time
4 with this Chicago Steel.

5 Q Do you recall the names of any people you
6 dealt with down there?

7 A I don't know. I don't.

8 MS. TIGHE: May I ask for clarification? Mr.
9 Martell, I think you said 4 to 5,000 gallons per
10 month. Do you mean 4,000 to 5,000?

11 BY THE WITNESS:

12 A 4,000 to 5,000 gallons per month.

13 MS. TIGHE: Thank you.

14 BY MR. KOWALSKI:

15 Q Mr. Martell, do you recall whether Chicago
16 Rawhide disposed of waste at the U.S. Scrap site?

17 A Yes, they did.

18 Q Do you recall whether they disposed of
19 waste at the 9th Avenue dump site?

20 A I'm not sure. I think they did, but I am
21 not sure.

22 Q And do you recall the location of the
23 facility that disposed of waste at that site or
24 sites?

1 A At the time, the factory was located at,
2 more or less, Elston and Division. And the exact
3 address was 1301 North Elston Avenue.

4 Q Did that location change at some point?

5 A They moved the factory in 1973 to 2720
6 North Greenview Avenue in Chicago.

7 Q Did you pick up from both facility
8 locations?

9 A At this time, the best that we can remember
10 is the 1301 North Elston Avenue facility.

11 Q And over what period of time did you
12 dispose of waste?

13 A 1969 until, we think, 1973.

14 Q And do you recall the type of waste that
15 was disposed of?

16 A Some type of chemicals.

17 Q When you say "we think," Mr. Martell,
18 besides yourself, who are you referring to?

19 A Well, on this one I conferred with Leroy
20 Brown, one of the drivers, trying to see if it jogs
21 his memory, so we could figure out the timeframe and
22 the exact plant location.

23 Q And did Mr. Brown recall the --

24 A Yes, he did. He recalled the Elston Avenue

1 and the year and the tractor. We tried to figure
2 out what truck went there.

3 Q Do you recall whether Chrome-Rite disposed
4 of waste at the U.S. Scrap site?

5 A No, they didn't.

6 Q Do you recall whether they disposed of
7 waste at the 9th Avenue dump site?

8 A Yes, they did.

9 Q And do you recall the location of the
10 facility where they generated the waste that was
11 disposed of?

12 A 4949 West Arthington, Chicago, Illinois.

13 Q And do you recall the period of time during
14 which they disposed of the waste?

15 A 1974 until 1975.

16 Q And do you recall the type of waste?

17 A Some sort of acid sludge.

18 Q Do you recall the volume that was disposed
19 of?

20 A 2,000 to 3,000 gallons a month.

21 MR. KOWALSKI: Let's take a short break.

22 (Whereupon a short break was had,
23 and the preceding deposition
24 continued as follows:)

1 BY MR. KOWALSKI:

2 Q Mr. Martell, I'd like to backtrack for just
3 a moment here.

4 Do you recall the volume of waste
5 that was disposed from Chicago-Rawhide at the U.S.
6 Scrap site?

7 A No recollection at this time. I'm not
8 sure.

9 Q Do you recall when Chicago Rotoprint
10 disposed of waste at the U.S. Scrap site?

11 A Yes, they did.

12 Q Do you recall whether they disposed of
13 waste at the 9th Avenue dump site?

14 A Yes, they did.

15 Q Do you recall the location of the facility
16 that disposed of waste at those two sites?

17 A 4601 West Belmont Avenue, Chicago,
18 Illinois.

19 Q And do you recall what period of time they
20 disposed of that waste?

21 A 1972 until 1975.

22 Q Do you recall the type of waste?

23 A Inks, solvents and various chemicals.

24 Q And do you recall the volume of waste that

1 was disposed of at those two sites?

2 A Fifty to eighty drums on a load and about
3 three or four times a year. Incidentally, this is a
4 division of W.F. Hall Printing Company in Chicago.

5 Q As we go along Mr. Martell, if you recall
6 any other details regarding any of these facilities
7 or if you recall going out there yourself, please
8 let me know.

9 A Okay.

10 Q Do you recall whether Chicago Sheepskin
11 disposed of waste at the U.S. Scrap site?

12 A Yes, they did.

13 Q Do you recall whether they disposed of
14 waste at the 9th Avenue dump site?

15 A Yes, they did.

16 Q And do you recall the location of the
17 facility that disposed of that waste?

18 A 4000 South Packers Avenue, Chicago,
19 Illinois.

20 Q And do you recall the time period during
21 which they disposed of that waste?

22 A 1972 until 1975.

23 Q And do you recall the nature of the waste?

24 A Animal hide, rendering waste is about what

1 I can remember.

2 Q Do you recall whether that had any kind of
3 chemicals mixed in with it?

4 A I'm not sure.

5 Q Do you recall the volume of waste disposed?

6 A 4,500 gallons in a trailer load or tanker
7 load, and that would be about four or five times a
8 month it was picked up.

9 Q Do you recall whether Clark Equipment
10 disposed of that waste at the U.S. Scrap site?

11 A No, they didn't.

12 Q Do you recall whether they disposed of any
13 waste at the 9th Avenue dump site?

14 A Yes, they did.

15 Q Do you recall the location of the facility
16 that disposed of that waste?

17 A 601 North Farnsworth Avenue, Aurora,
18 Illinois.

19 Q Do you recall --

20 A This is a division, incidentally, of Austin
21 Western Company.

22 Q Do you recall the period of time during
23 which Clark Equipment disposed of waste at the 9th
24 Avenue dump site?

1 A 1974 until 1975.

2 Q Do you recall the type of waste?

3 A Oil.

4 Q Do you recall the volume of waste?

5 A One to two, 4,500-gallon loads per month.

6 Q Do you recall whether Clark Oil and
7 Refining Company disposed of waste at the U.S. Scrap
8 site?

9 A Yes, they did.

10 Q Do you recall whether they disposed of
11 waste at the 9th Avenue dump site?

12 A Yes, they did.

13 Q Do you recall the location of the facility
14 that disposed of that waste?

15 A It's a vast plant, and it's, like, the
16 center of the office is at 131st and Kedzie Avenue,
17 Blue Island, Illinois.

18 Q Do you recall picking up any of those loads
19 yourself?

20 A Yes, I did. When we got our first Vac All,
21 we got the job to clean out one of those big storage
22 tanks there, so I was there for two or three weeks
23 at a time, you know, every day, just trying to get
24 that Vac All to do the job. We really needed two

1 for that job, and we only had one. And we used
2 vacuum tankers there, too.

3 But besides that, our main business
4 was hauling their waste away or their liquid waste
5 away every day. These were like one-time jobs.
6 Each tank is a one-time job, but I was there many
7 times at Clark Oil.

8 Q What period of time did you dispose of
9 waste for Clark Oil?

10 A 1971 until 1975.

11 Q Do you recall what kind of waste that was?

12 A It would be oil, solvents and, also, some
13 paints.

14 Q The tank cleaning job that you mentioned,
15 would that be oil?

16 A That one, it was oil. It was some kind of
17 heavy black oil, like a sludgy oil because it was
18 too heavy, really, for the vacuum tankers. They
19 just couldn't get it to go. The Vac All, it would
20 suck a brick up, house brick. It's the one that
21 took it out of there. Some kind of heavy black oil,
22 like a crude oil, something like that.

23 Q Do you recall the volume of waste that was
24 disposed of for Clark Oil?

1 A Well, let's see. Five to seven tanker
2 loads per week, and that's the normal business.
3 That's just the every-day business. And then
4 about -- On that Vac All job, you know, it was, I'd
5 say we send 50 to 80,000 to 100,000 gallons of that
6 heavy stuff out of those tanks we hauled away.

7 And then they had a little
8 warehouse over on the west side of their facility,
9 and they were cleaning it out and they had a lot of
10 drums of paint in there. And we got two or three
11 loads of 50 to 70 drums on a load of paint, old
12 paint.

13 Q During that one tank-cleaning job when you
14 said 50 to 80,000 gallons, you mean 50,000 to
15 80,000?

16 A 50,000 to 80,000.

17 Q Do you recall whether Coldwell General
18 disposed of waste at the U.S. Scrap site?

19 A Yes -- Can we go off the record?

20 (Discussion held off the record.)

21 BY THE WITNESS:

22 A Coldwell General is really Matherson-Selig
23 Company. In 1973, they bought Matherson-Selig,
24 which is still all at the same address, which is

1 7301 West Wilson Avenue, Chicago, Illinois. So
2 previous to '73 would be Matherson-Selig, and after
3 '73 to '75 it would be Coldwell General.

4 MS. TIGHE: May I have clarification here? Do
5 you mean Chicago Illinois, or is it in some other
6 place?

7 BY THE WITNESS:

8 A I believe that the address in the book
9 shows Chicago, even though it looks like it's in
10 Norridge, I think.

11 MS. TIGHE: Or Harwood Heights?

12 BY THE WITNESS:

13 A Yeah, Norwood Heights.

14 MS. TIGHE: Harwood Heights.

15 BY THE WITNESS:

16 A Maybe Harwood Heights, somewhere around
17 there. But I think the address, or their post
18 office address, shows in the book as Chicago,
19 because the zip is 60656.

20 BY MR. KOWALSKI:

21 Q Whether under the name Matherson-Selig or
22 Coldwell General, do you recall whether its waste
23 went to U.S. Scrap?

24 A Oh, yeah, for sure.

1 Q And would its waste have gone to 9th
2 Avenue?

3 A Yes, it did.

4 Q And do you recall the period of time that
5 waste from these companies would have been disposed
6 of at those two sites?

7 A 1965 until 1975.

8 Q And do you recall the type of waste that
9 was disposed of?

10 A Paint, inks, solvents and glues.

11 Q Do you recall the volume of waste?

12 A Well, it's -- I think in its entirety, it's
13 probably somewhere around 50 to 100 drums because,
14 you know, it wasn't the place they generate a real
15 lot of stuff, but 100s of 500 gallon pails and cans
16 of this ink and paint and glues and everything was
17 always thrown in with the solid waste. In the
18 beginning, it was hauled as solid waste, and the
19 chemical waste was thrown in. Later on, it was
20 hauled separately.

21 Q Mr. Martell, did you ever haul from that
22 facility yourself?

23 A Yes, I did, many times.

24 Q Do you recall whether Commander Packaging

1 ever disposed of waste at U.S. Scrap?

2 A Yes, they did.

3 Q Do you recall whether they disposed of
4 waste at the 9th Avenue dump site?

5 A Yes, they did.

6 Q Do you recall the location of the facility
7 that disposed of that waste?

8 A 4925 Indiana Avenue, Lisle, Illinois.

9 Q And do you recall the time period during
10 which that waste was disposed?

11 A 1973 until 1975.

12 Q Do you recall the type of waste that was
13 disposed?

14 A Solvents, adhesives and inks.

15 Q And do you recall the volume of waste that
16 was disposed?

17 A Fifty to eighty drums per month.

18 Q Do you recall whether Container Corporation
19 disposed of waste at the U.S. Scrap site?

20 A Yes, they did.

21 Q Do you recall whether they disposed of
22 waste at the 9th Avenue dump site?

23 A No, they didn't.

24 Q Do you recall the location of the facility

1 that disposed of waste at the U.S. Scrap site?

2 A 400 East North Avenue, Carol Stream,
3 Illinois.

4 Q Do you recall the period of time during
5 which it disposed of the waste?

6 A 1965 until 1968 or '69.

7 Q Do you recall the type of waste that they
8 disposed?

9 A Paints, solvents, inks, oils and glues.

10 Q And do you recall the volume of waste?

11 A Twenty to forty drums, every three or four
12 months, and I went there myself a few times.

13 Q Do you recall whether Collis Company
14 disposed of waste at the U.S. Scrap site?

15 A Yes, they did.

16 Q Do you recall whether Collis Company
17 disposed of waste at the 9th Avenue dump site?

18 A Yes, they did.

19 Q Do you recall the location of the facility
20 that disposed of waste at those two sites?

21 A Not the street, but it's in Clinton, Iowa.

22 Q And do you recall the periods of time
23 during which it disposed of those wastes?

24 A 1972 until 1975.

1 Q Do you recall the type of waste?

2 A Some form of acid waste.

3 Q Do you recall the volume of waste it was
4 disposing of at the two sites?

5 A Two to three, 4,000 gallon loads per month.

6 Q Do you recall any details regarding that
7 particular account in Clinton, Iowa?

8 A No, except that they'd break down once in a
9 while on I-80 and need assistance. They broke the
10 universal drive one time and the wheels came off the
11 trailer a couple times, things likes that. But this
12 was, like, one of our long distance hauls.

13 Q Do you recall whether Continental Can
14 Company disposed of waste at the U.S. Scrap site?

15 A Yes, they did.

16 Q Do you recall whether they disposed of
17 waste at this 9th Avenue dump site?

18 A Yes, they did.

19 Q Do you recall the location of the facility
20 that disposed of waste at those sites?

21 A Well, there was three plants for
22 Continental Can that we handled. Okay. The first
23 one was the Bedford Park or Clearing Plant, I think
24 they called it, and that was at 5401 West 65th

1 Street.

2 The second plant was the Chicago
3 plant, and that was at 1819 North Major Avenue,
4 Chicago, Illinois.

5 And the third factory or plant was
6 in Milwaukee, Wisconsin, and I don't have that
7 address.

8 Q Do you recall the period of time during
9 which the Bedford Park plant disposed of waste at
10 the two sites?

11 A 1965 until 1975.

12 Q Do you recall the kind of waste you picked
13 up from it?

14 A Solvents, paints, varnishes, adhesives and
15 oils.

16 Q And do you recall the volume it generated?

17 A About a trailer load of drums per month.

18 Q And do you recall the time period during
19 which the Chicago facility disposed of waste at the
20 two sites?

21 A 1965 until 1975.

22 Q And do you recall the type of waste it
23 disposed of?

24 A Solvents, paints, varnishes, adhesives and

1 oils.

2 Q Do you recall the volume of waste they
3 disposed of?

4 A One to two loads of 60 to 70 drums a month.

5 Q Did the Chicago plant have any other name
6 that you're aware of?

7 A Yeah, the other name of the plant would be
8 White Cap Plant.

9 Q Do you recall the time period during which
10 the Milwaukee plant disposed of waste at the two
11 sites?

12 A 1974 until 1975.

13 Q And do you recall the type of waste it
14 disposed of at the sites?

15 A Some form of acid waste.

16 Q And do you recall the volume of waste it
17 disposed of at the two sites?

18 A Two or three 4,000-gallon tankers per
19 month.

20 Q Do you recall whether Corn Products Company
21 disposed of waste at the U.S. Scrap site?

22 A Yes, they did.

23 Q Do you recall whether Corn Products Company
24 disposed of waste at the 9th Avenue dump site?

1 A Yes, they did.

2 Q Do you recall the location of the facility
3 from which it disposed of the waste?

4 A 63rd and Archer Road in Argo, Illinois.

5 Q And do you remember the time period during
6 which it disposed of the waste?

7 A 1966 until 1975.

8 Q Do you recall the type of waste it disposed
9 of?

10 A Solvents, paints, oils, and chemicals.

11 Q And do you recall the volume of waste
12 disposed?

13 A Twenty to forty drums, three to four times
14 a year.

15 Q Do you recall whether Cosden Oil disposed
16 of waste at the U.S. Scrap site?

17 A Yes, they did.

18 Q Do you recall whether Cosden Oil disposed
19 of waste at the 9th Avenue dump site?

20 A No, they didn't.

21 Q Do you recall the location of the facility
22 from which Cosden Oil disposed of waste at the U.S.
23 Scrap site?

24 A 142nd and Paxton Road, Calumet City,

1 Illinois.

2 Q And during what periods of time did it
3 dispose of those wastes?

4 A 1970.

5 Q And do you recall the type of waste?

6 A Some form of plastic sludge from a waste
7 treatment pond.

8 Q And do you recall the volume of waste
9 disposed?

10 A There was only one load involved, and it
11 was 4,500 gallons, and it was our first -- one of
12 the first times with our new vacuum tanker, not Vac
13 All, and I went there personally with them to load
14 that trailer to try it out and demonstrate how
15 effective it was to the plant manager and that. It
16 wasn't too effective because the stuff froze solid,
17 and it took about two weeks to dig it out by hand.
18 It was a disaster, you know; there was only one load
19 there.

20 Q You don't happen to recall the name of the
21 plant manager, by any chance?

22 A No, I should, but I don't.

23 Q Do you recall whether Crescent Company
24 disposed of any waste at the U.S. Scrap site?

1 A I don't remember at this time.

2 Q Do you recall whether they disposed of any
3 waste at the 9th Avenue dump site?

4 A I don't remember at this time.

5 Q Do you recall whether Crown Cork and Seal
6 Company disposed of waste at the U.S. Scrap site?

7 A Yes, they did.

8 Q Do you recall whether they disposed of any
9 waste at the 9th Avenue dump site?

10 A Yes, they did.

11 Q Do you recall the location of the facility
12 that disposed of waste at those two sites?

13 A 3501 West 31st Street, Chicago, Illinois.

14 Q And do you recall the time period during
15 which it disposed of those wastes?

16 A 1965 until 1975.

17 Q Do you recall the type of waste disposed?

18 A Solvents, paints, varnishes, adhesives and
19 oils.

20 Q And do you recall the volume of waste
21 disposed of at the two sites?

22 A Eighty to 100 drums a month. And I went in
23 myself and picked up lead.

24 Q Do you recall whether Culligan Company

1 disposed of waste at the U.S. Scrap site?

2 A I'm not sure.

3 Q Do you recall whether Culligan Company
4 disposed of waste at the 9th Avenue dump site?

5 A Yes, they did.

6 Q Do you recall the location of the facility
7 that disposed of waste at the 9th Avenue dump site?

8 A One Culligan Parkway, Northbrook, Illinois.

9 Q Do you recall the period of time during
10 which Culligan disposed of waste at 9th Avenue dump
11 site?

12 A 1974 until 1975.

13 Q Do you recall the type of waste disposed?

14 A Some type of chemicals.

15 Q And do you recall the volume of waste
16 disposed?

17 A Initially, there was like 50 to 70 drums
18 there, and this is according to Leroy Brown. And
19 after that, it was like a small stop, 10 to 30 drums
20 at a pickup, but I don't know how often that pickup
21 was.

22 Q Do you recall whether Cuneo Press disposed
23 of waste at the U.S. Scrap site?

24 A Yes, they did.

1 Q Do you recall whether Cuneo Press disposed
2 of waste at the 9th Avenue dump site?

3 A No, they didn't.

4 Q Do you recall the location of the facility
5 that disposed of waste at U.S. Scrap?

6 A 2242 South Grove Street, Chicago, Illinois.

7 Q And do you recall what period of time Cuneo
8 Press disposed of waste at U.S. Scrap?

9 A 1969 to 1971.

10 Q And do you recall the type of waste
11 disposed?

12 A Acids and inks.

13 Q And do you recall the volume of waste?

14 A Fifty to sixty drums, seven or eight times
15 in total, and I was there with the truck. I don't
16 remember if I actually drove the truck, but I can
17 remember standing on their dock because they were
18 putting the drums on kind of stupid, and I was
19 telling the guy the load was going to fall off
20 because it was a flatbed trailer. We didn't have a
21 vanbed trailer for that.

22 Q Do you recall whether Custom Organics
23 disposed of any waste at the U.S. Scrap site?

24 A I don't remember at this time.

1 Q Do you recall whether Custom Organics
2 disposed of waste at the 9th Avenue dump site?

3 A I don't remember at this time.

4 Q Do you recall whether Danley Machine
5 Company disposed of waste at the U.S. Scrap site?

6 A Yes, they did.

7 Q Do you recall whether Danley Machine
8 Company disposed of waste at the 9th Avenue dump
9 site?

10 A No, they didn't.

11 Q Do you recall the location of the facility
12 from which Danley Machine disposed of waste?

13 A I don't have the street, but it's Cicero,
14 Illinois.

15 Q And do you recall the time period during
16 which Danley disposed of waste at U.S. Scrap?

17 A 1965 until 1969.

18 Q Do you recall the type of waste disposed?

19 A Grease, paints and oils.

20 Q And do you recall the volume of waste
21 disposed of at that site?

22 A Eight to ten drums per month.

23 Q Do you recall whether Dap, D-a-p,
24 Incorporated, disposed of waste at U.S. Scrap site?

1 A I'm not sure at this time.

2 Q Do you recall whether Dap disposed of waste
3 at the 9th Avenue dump site?

4 A I'm not sure at this time.

5 Q Do you recall whether Daubert Chemical,
6 D-a-u-b-e-r-t, disposed of waste at the U.S. Scrap
7 site?

8 A I'm not sure at this time.

9 Q Do you recall whether they disposed the
10 waste at 9th Avenue dump site?

11 A I'm not sure at this time.

12 Q Do you recall, Mr. Martell, Daubert being a
13 customer in connection with your business prior to
14 U.S. Scrap and 9th Avenue?

15 A Yes, it was.

16 Q But in terms of whether they remained a
17 customer during the time period of U.S. Scrap and
18 9th Avenue, you're unsure?

19 A I'm pretty sure we lost it to a Charles
20 Lenz & Company. They put a container in there. We
21 had trailers.

22 Q Do you recall whether DeMert and Dougherty
23 was a customer of U.S. Scrap Company?

24 A A customer? You mean --

1 Q Did they dispose of any waste at the U.S.
2 Scrap Site?

3 A Yes, they did.

4 Q Did they dispose of any waste at the 9th
5 Avenue dump site?

6 A No, they didn't.

7 Q Do you recall the location of the facility
8 that disposed of waste at U.S. Scrap?

9 A 500 West 41st Street or 41st Avenue. That
10 is Cicero, Illinois.

11 Q And do you recall the time period during
12 which they disposed of waste at the U.S. Scrap site?

13 A 1969 until 1972.

14 Q And do you recall the type of waste that
15 was disposed there?

16 A Some kind of chemical and some additive
17 where they make heat for your cars, you know,
18 something, some chemical that's parts of that.

19 Q The brand name "Heet"?

20 A Brand name Heet.

21 Q And do you recall the volume of waste that
22 was disposed at the U.S. Scrap site?

23 A Fifty to eighty drums per month.

24 Q Do you recall whether DeSoto Chemical

1 disposed of waste at the U.S. Scrap site?

2 A Yes, they did.

3 Q Do you recall whether DeSoto Chemical
4 disposed of waste at the 9th Avenue dump site?

5 A Yes, they did.

6 Q Do you recall the location of the facility
7 from which DeSoto disposed?

8 A There were two facilities. One was at 1034
9 South Kostner Avenue, Chicago, Illinois, and the
10 other one was at 300 North State Street, Chicago
11 Heights, Illinois.

12 Q And do you recall the time period during
13 which DeSoto disposed of waste at those two sites?

14 A 19 -- Between the two of them, 1967,
15 approximately, until 1975.

16 Q And do you recall the type of waste that
17 was disposed of at the two sites?

18 A Paints, solvents, varnishes, oils, resins
19 and emulsions.

20 Q And do you recall the volume of waste
21 disposed of at the two sites?

22 A Well, the Chicago Heights plant had about
23 three to four trailer loads per month, and the
24 Kostner Avenue plant had about two to three trailer

1 loads per month.

2 Q Do you recall whether Dreeblan Paint
3 disposed of waste at the U.S. Scrap site?

4 A Yes, they did.

5 Q Do you recall whether Dreeblan Paint
6 disposed of waste at the 9th Avenue dump site?

7 A Yes, they did.

8 Q Do you recall the location of the facility
9 that disposed of waste at those two sites?

10 A 3428 West 48th Place, Chicago, Illinois.

11 Q And do you recall over what period of time
12 they disposed of waste at those sites?

13 A 1972 to 1975.

14 Q And do you recall the type of waste
15 disposed?

16 A Paints and solvents.

17 Q And do you recall the the volume of waste
18 disposed?

19 A It's three to four, almost on a weekly
20 basis, a 4 to 5,000 gallon tanker. That's three to
21 four tankers a month of 4 to 5,000 gallons each, and
22 about 50 drums per month, also.

23 MS. TIGHE: Mr. Martell, to clarify, do you mean
24 4,000 to 5,000?

DuPont

1 BY THE WITNESS:

2 A Gallons.

3 MS. TIGHE: Thank you.

4 MR. THOMAS: Three to four, 5,000 gallons per
5 month or per week?

6 BY THE WITNESS:

7 A Well, reason for that, if you want an
8 answer is, we had different size vacuum tankers.
9 The original tanker was 4,500 gallons, but tankers
10 accumulate a little crap in the bottom, so you might
11 say the effective capacity at 4,000. The new ones
12 were 5,500 gallons, so they had the real capacity of
13 5,000, 5,200, so that's why the discrepancy.

14 Q So it was between three and four tankers
15 per month, and they would haul between 4,000 and
16 5,000 gallons at a time?

17 A Right.

18 Q Do you recall whether Du Pont disposed of
19 waste at the U.S. Scrap site?

20 A Yes, they did.

21 Q Do you recall whether Du Pont disposed of
22 waste at the 9th Avenue site?

23 A Yes, they did.

24 Q Do you recall the location of the facility

1 from which Du Pont disposed of waste at those sites?

2 A 2100 North Elston Avenue, Chicago,
3 Illinois.

4 Q Do you recall the time periods during which
5 they disposed of the waste?

6 A 1965 until 1975.

7 Q Do you recall the type of waste disposed?

8 A Paints, laquers, thinners, solvents, oils,
9 dryers, rollers, varnishes, clothing, tools, all
10 kinds of all this chemically contaminated stuff they
11 loaded on top of the barrels.

12 Q Do you recall the volume of waste disposed
13 of at the two sites?

14 A 100 to 150 drums a week. And I picked this
15 stop up many times. I don't know if you're
16 interested, but Du Pont did not deal directly with
17 us. We dealt with a company called Star Trucking,
18 which were a disposal company. They primarily had
19 only two accounts, Du Pont and Montgomery Wards.
20 They had a huge Montgomery Ward plant. And they
21 leased a little piece of land, a little bit south of
22 Chicago Avenue and a little west of Orleans Street
23 for us to park our trailers. And they had a little
24 garage there, and we dropped trailers there, empty

1 trailers, you know, like the old 60-drum trailers,
2 later 70-drum trailers, and they would go all day
3 long to Du Pont and pick up these drums in a little
4 dump truck. Maybe it only hauls ten drums in there,
5 and they'd come back, wheel them off their dump
6 truck and put them in our trailers.

7 At nighttime, because you couldn't
8 get in there in the daytime because there was all
9 cars from the Montgomery Wards blocking everything,
10 so you had to come at nighttime and switch the
11 trailer. They made us finally room where we didn't
12 have to double, where we'd drop an empty, grab a
13 full one and go. Later on, they brought the drums
14 to the U.S. Scrap site themselves, because they lost
15 the parking lot. That's why.

16 Q Mr. Martell, do you recall whether Ekco
17 Products, E-k-c-o, Company disposed of waste at the
18 U.S. Scrap site?

19 A Yes, they did.

20 Q Do you recall whether they disposed of of
21 waste at the 9th after dump site?

22 A Yes, they did.

23 Q Do you recall the location of the facility
24 from which they disposed of those wastes?

1 A 1949 North Cicero Avenue, Chicago,
2 Illinois.

3 Q Do you recall the time period during which
4 they disposed of those wastes?

5 A 1972 until 1975.

6 Q Do you recall the type of waste disposed?

7 A Oils, solvents and paints.

8 Q And do you recall the volume of waste
9 disposed at those two sites?

10 A 80 to 120 drums a month.

11 Q Do you recall whether Electric Plating
12 disposed of waste at the U.S. Scrap site?

13 A I'm not sure at this time.

14 Q Do you recall whether Electric Plating
15 disposed of waste at the 9th Avenue dump site?

16 A I am not sure at this time.

17 Q Do you recall whether Englander Mattress
18 Company disposed of waste at this U.S. Scrap site?

19 A Yes, they did.

20 Q Do you recall whether Englander Mattress
21 Company disposed of waste at the 9th Avenue dump
22 site?

23 A No, they didn't.

24 Q Do you recall the location of the facility

1 from which Englander Mattress Company disposed of
2 waste?

3 A 104th Street & Champagne Avenue, Chicago,
4 Illinois.

5 Q Do you recall the periods of time during
6 which they disposed of those wastes?

7 A 1965 until 1968.

8 Q Do you recall the type of waste disposed?

9 A Fabric, plastic, paints and dyes.

10 Q And do you recall the volume of waste
11 disposed?

12 A I'm just going to guess and say it was,
13 probably, somewhere around 100 drums for that entire
14 period of time.

15 Q Do you recall whether Enterprise Paint
16 Company disposed of waste at the U.S. Scrap site?

17 A Yes, they did.

18 Q Do you recall whether Enterprise Paint
19 Company disposed of waste at the 9th Avenue dump
20 site?

21 A Yes, they did.

22 Q Do you recall the location of the facility
23 from which Enterprise Paint disposed of waste at
24 those sites?

1 A 2451 South Ashland Avenue, Chicago,
2 Illinois.

3 Q And was that the only facility that
4 disposed of waste at those sites?

5 A We're not sure, or I'm not sure. They have
6 another facility, and I remember Dave Head telling
7 me and asking me if we wanted -- I think it was
8 Wheeling -- did they want to go out there. And I
9 just don't remember, you know, exactly if we did
10 start in with that place in Wheeling.

11 Q Do you recall the time period during which
12 Enterprise disposed of waste at the two sites?

13 A 1965 until 1975.

14 Q And do you recall the type of waste
15 disposed?

16 A Paints, solvents, thinners, wax, varnishes,
17 oils, chemicals and coatings.

18 Q Do you recall the volume of waste disposed
19 at those two sites?

20 A Four to five trailer loads of drums per
21 month. And then starting sometime around 1971, one,
22 4,000 to 5,000-gallon tanker load every three
23 months. And I went there many times. I bought that
24 stop. I paid a guy to get that business. And these

1 were very cheap people. For a quarter, they would
2 play you against another guy just to get a little
3 cheaper price out of you for hauling. Sometimes
4 they'd let that guy haul for a month or two just to
5 get you a little hungrier so you wouldn't raise your
6 price.

7 Q Do you recall the name of the individual
8 you bought this stop from?

9 A Yeah, I think it's John. It's JaJa, but
10 his name is Mrozak, M-r-o-z-a-k, or z-e-k, and I
11 think it's John Mrozak, but it was JaJa, that was
12 what everybody called him.

13 Q Was he an independent hauler you bought the
14 stop from?

15 A Yeah. He had all them little stops. I
16 think he had Crown Cork and Seal, too, and we bought
17 Elliott off him, too. He's deceased. He died of a
18 massive heart attack.

19 Q Do you recall whether Enterprise Wire
20 Company disposed waste at the U.S. Scrap site?

21 A Yes, they did.

22 Q Do you recall whether they disposed of
23 waste at the 9th Avenue dump site?

24 A Yes, they did.

1 Q Do you recall the location of the facility
2 from which they generated that waste?

3 A 2842 West Vermont Avenue, and that's Blue
4 Island, Illinois.

5 Q Do you recall the time period during which
6 they disposed of that waste?

7 A 1970 until 1975.

8 Q Do you recall the type of waste?

9 A Acid waste.

10 Q And do you recall the volume of waste
11 disposed?

12 A Six to seven, 5,000 gallon, more or less,
13 loads per month.

14 Q Do you recall whether Felt Products
15 Manufacturing disposed of waste at the U.S. Scrap
16 site?

17 A Incidentally, I went to Enterprise Wire
18 myself a couple times, as an assistant, though, not
19 as driving.

20 Q Do you recall who was driving when you went
21 there?

22 A Probably Leroy and Thompson and McFarlin,
23 you know, it was a fairly large stop.

24 Q When you went as an assistant, to assist in

1 loading?

2 A To assist in some problem, not to load,
3 some problem they'd have, either with the vacuum
4 tanker machine or flat tire or something like that.
5 You'd bring them a tire if there was nobody else
6 around.

7 Q Do you recall whether Felt Products
8 Manufacturing disposed of waste at the U.S. Scrap
9 site?

10 A Yes, they did.

11 Q Do you recall whether they disposed of
12 waste at the 9th Avenue dump site?

13 A Yes, they did.

14 Q And do you recall the location of the
15 facility from which they disposed of that waste?

16 A 7450 North McCormick Boulevard, Skokie,
17 Illinois.

18 Q And do you recall the time period during
19 which they disposed of that waste?

20 A 1972 until 1975.

21 Q And do you recall the nature of the waste?

22 A Oil waste.

23 Q And do you recall the volume of waste
24 disposed?

1 A A trailer load of drums, three or four
2 times a year.

3 Q Do you recall whether Fiber Bond disposed
4 of waste at the U.S. Scrap site?

5 A Yes, they did.

6 Q Do you recall whether Fiber Bond disposed
7 of the waste at the 9th Avenue dump site?

8 A Yes, they did.

9 Q Do you recall the location of the facility
10 from which they disposed of that waste?

11 A 3300 South Kedzie Avenue, Chicago,
12 Illinois.

13 Q Do you recall the time period during which
14 they disposed of waste at these two sites?

15 A Well, there were two kinds of waste we
16 hauled. We hauled in tankers, vacuum tankers, and
17 we hauled also drums. The tankers were from 1971
18 until 1975. The drums were '65, 1965, until 1975,
19 and the man in charge there was Al Miclan,
20 M-i-c-l-a-n, something like that.

21 Q Do you recall the type of waste they
22 disposed of?

23 A Some -- I don't know what you call it,
24 even, some chemical waste.

1 Q Do you recall the volume of waste disposed
2 from there?

3 A One to two, 4,000 to 5,000-gallon tankers
4 per month. And on drums, I don't know how many
5 drums were involved. It was erratic. It was not a
6 constant thing.

7 Q Did you personally pick up at that stop?

8 A Yes, I did, many times.

9 Q Do you recall whether Flint Ink Company
10 disposed of waste at this U.S. Scrap site?

11 A Yes, they did.

12 Q Do you recall whether Flint Ink disposed of
13 waste at the 9th Avenue dump site?

14 A Yes, they did.

15 Q And do you recall the location of the
16 facility from which they generated that waste?

17 A Only that it's in Broadview, Illinois.

18 Q Do you recall the time periods during which
19 they disposed of that waste?

20 A 1969 until 1975.

21 Q And do you recall the type of waste?

22 A Inks, solvents, oils, and resins.

23 Q Do you recall the volume of waste disposed
24 of at those two sites?

1 A One to two trailer loads per month. And a
2 trailer load could be, like, 50 to 80 drums. And I
3 didn't go to the factory, but I've handled their
4 drums many of the times because in the earlier years
5 I actually unloaded these trailers with this guy,
6 Water Boy or Leroy Brown. We were all unloaders,
7 and I remember their drums very well because we
8 looked for certain drums and for certain loads,
9 because these are the loads that we knew could bring
10 us more money. And they had nice drums, so
11 everybody looked for Flint loads all the time.

12 Q Because of the quality of their drums?

13 A Right. Some people had lousy drums, and
14 some people had good drums, and some people had
15 drums where the stuff didn't come out, too, so you
16 had to really struggle to get that material out of
17 there.

18 Q Do you recall any companies with
19 particularly lousy drums?

20 A Oh, yeah. Fox Valley Paint had real heavy
21 paint. You had to stand them on edge and put a blow
22 torch on them to get the stuff out of there or wait
23 until did got to be 110 outside.

24 Q Mr. Martell --

1 A We did that, too, when drums went up enough
2 we went back out.

3 Q Do you recall whether Frederick H. Levey
4 Ink Co. disposed of waste at the U.S. Scrap site?

5 A Yes, they did.

6 Q Do you recall whether they disposed of
7 waste at the 9th Avenue dump site?

8 A No, they didn't.

9 Q Do you recall if they are affiliated with
10 any other company?

11 A It's a division of Columbian Carbon
12 Company.

13 Q And do you recall the location of the
14 facility from which that waste was generated that
15 was disposed of at U.S. Scrap?

16 A 4250 West 42nd Place.

17 Q And do you recall the time period during
18 which the facility disposed of waste?

19 A 1965 until 1967, when the plant burned
20 down.

21 Q Do you recall the type of waste disposed of
22 at that site?

23 A Inks, resins and this carbon powder.

24 Q How would the carbon powder be contained

1 when you picked it up?

2 A It would be in drums and sometimes in
3 plastic -- not plastic -- paper drums and sometimes
4 in steel drums. In the earlier days, they weren't
5 as fussy how they put that stuff in there for the
6 guy to haul away. Everything is all mushed-moshed,
7 mixed up any old way. Later on, people got more
8 fussy how they separated everything because they
9 were more safety-conscious and things like that.

10 Q Do you recall the volume of waste you would
11 dispose of from Frederick H. Levey?

12 A Fifty to one hundred drums a week.

13 Q Do you recall whether Fox Valley --

14 A Incidentally, I went to Levey many times.
15 I remember going there one time it was 22 below
16 zero, and with the wind it was about 80 below zero.
17 And when I came out, I can remember just like it
18 happening, there was a lady crying because her car
19 wouldn't start. And nobody would stop and help her.
20 Everybody just wanted to jump in their car and go,
21 and she's bawling over there. It's got nothing to
22 do with the loads, though.

23 Q Do you remember whether Fox Valley
24 Manufacturing disposed of waste at the U.S. Scrap

1 site?

2 A Yes, they did.

3 Q And do you recall whether they disposed of
4 waste at the 9th Avenue dump site?

5 A Yes, they did.

6 Q Do you recall the location of the facility
7 from which they generated that waste?

8 A 1600 Fleetwood Drive, Elgin, Illinois.

9 Q Do you recall the periods of time during
10 which they disposed of that waste?

11 A 1972 until 1975.

12 Q Do you recall the nature of the waste?

13 A Old paint.

14 Q And do you recall the volume of waste
15 disposed?

16 A Semi-trailer load about five or six times
17 per year. And, again, I remember these drums very
18 well. They were very heavy. They were, like, 700
19 pounds a drum. You'd have to get a real good truck
20 to push that drum along.

21 Q Do you recall whether Furnas Electric,
22 F-u-r-n-a-s, disposed of waste at the U.S. Scrap
23 site?

24 A Yes, they did.

1 Q Do you recall whether Furnas Electric
2 disposed of waste at the 9th Avenue dump site?

3 A Yes, they did.

4 Q Do you recall the location of the facility
5 from which they generated the waste?

6 A 1000 McKer Street, Botavia, Illinois.

7 Q And do you recall the time period during
8 which they disposed of that waste?

9 A 1970 until 1975.

10 Q Do you recall the type of waste disposed?

11 A Oils, solvents, paints and varnish.

12 Q Do you recall the volume of waste disposed?

13 A Twenty to forty drums, about every 60 to 90
14 days. They'd have a small load.

15 Q Do you recall whether Georgia Pacific
16 Company disposed of any waste at the U.S. Scrap
17 Site?

18 A I'm not sure. Except it's either Georgia
19 Pacific or U.S. Gypsum that dumped all the stuff at
20 9th Avenue in 1974, '75. But I really can't say for
21 sure which one it was. It's one of those two,
22 though, because there was Gypsum Boards in vast
23 quantities.

24 Q Do you recall the location of the facility

1 that generated that waste?

2 A No. It's either in East Chicago -- I think
3 it's in East Chicago, or Gary, one of those two
4 places.

5 Q And do you recall the specific volume of
6 that waste?

7 A Oh, three, four trucks a day, you know,
8 this went on every day.

9 Q For how long?

10 A About, let's say a year, but I can't
11 pinpoint the months. So it's sometime in '74 to
12 '75. It went on for about a year or a little
13 longer.

14 Q And that was only Gypsum boards or other
15 things?

16 A No, just gypsum boards.

17 Q Do you know whether Glidden Paint Company
18 disposed of waste at the U.S. Scrap site?

19 A Yes, they did

20 Q Do you recall whether Glidden Paint
21 disposed of waste at the 9th Avenue dump site?

22 A Yes, they did.

23 Q Do you recall the location of the facility
24 from which that waste was generated?

1 A 1800 North LeClaire, Chicago, Illinois.

2 Q Do you recall the time period during which
3 that waste was disposed?

4 A 1967 until 1975.

5 Q And do you recall the type of waste
6 disposed?

7 A Paint, varnish, resins and chemicals.

8 Q And do you recall the volume of waste
9 disposed?

10 A One to three trailer loads a month, and I
11 have been there to pick up loads. I've been when
12 our drivers had trouble getting loads, and I have
13 dumped these loads, or unloaded these trailers,
14 myself many times. They're yellow and green drums,
15 nice drums.

16 Q Mr. Martell, do you recall whether Glidden
17 Company changed names during the period of time it
18 was a customer of yours?

19 A Yeah. Glidden, until 1969, was Glidden.
20 Then it became Glidden Durkee Division, SCM
21 Corporation. And they're home office was 900 Union
22 Commercial Building, Cleveland, Ohio. They also had
23 a plant in southwest of Joliet. It was Glidden
24 Durkee Division of SCM Corporation, and I believe

Glidden

1 it's called the Industrial Foods Division, but the
2 material there, the waste, according to Leroy Brown,
3 was some kind of an acid sludge. And the address of
4 that one is Arsenal exit off of I-55. It shows
5 Joliet, Illinois.

6 Q So your company would haul for that
7 facility, as well?

8 A Yes.

9 Q Do you recall the time period during which
10 you hauled for that particular facility?

11 A I am going to say on this -- this is, like,
12 a guess -- 75 part is okay, but I'd say about 73 to
13 75.

14 Q What kind of waste was that?

15 A Some kind of an acid sludge. This factory
16 is next to Rexene Polymers, which is a factory plant
17 we had. That's why I know it was there. I've seen
18 it, and I have been there.

19 Q Did that waste go to the U.S. Scrap site?

20 A I think that one -- Well, for sure it went
21 to the 9th Avenue site. I'm not sure about the U.S.
22 Scrap site.

23 Q Do you recall whether Good Humor Company
24 disposed of waste at the U.S. Scrap site?

1 A Yes, they did.

2 Q And did they dispose of waste at the 9th
3 Avenue dump site?

4 A Yes, they did.

5 Q Do you recall the location of the facility
6 that disposed of that waste?

7 A 4649 West Armitage Avenue, Chicago,
8 Illinois.

9 Q And do you recall what periods of time Good
10 Humor disposed of that waste?

11 A 1973 until 1975.

12 Q Do you recall the type of waste?

13 A Some kind of an ice cream liquid, ice
14 cream.

15 Q Was there any waste other than food waste?

16 A I don't think so.

17 Q And do you recall the volume of waste
18 disposed?

19 A One to two, 4,000 to 5,000 gallons a week
20 during ice cream season. It's predominant volume is
21 in the warm weather.

22 MS. TIGHE: Ed, off the record for a minute.

23 (Discussion held off the record.)

24

1 BY MR. KOWALSKI:

2 Q Mr. Martell, just to backtrack a moment,
3 going back to the Glidden Durkee facility located in
4 Joliet, do you recall what the volume of waste was
5 from that facility?

6 A It was one vacuum tanker load per week, but
7 I am not sure if that was a full load or not. It
8 could have been like 3 to 4,000 gallons in there.

9 Q 3,000 to 4,000?

10 A 3,000 to 4,000, yes, sir.

11 Q Do you recall when Graftec, G-r-a-f-t-e-c
12 Press disposed of waste at the U.S. Scrap site?

13 A At this time, I'm not sure.

14 Q Do you recall whether Graftec Press
15 disposed of waste at the 9th Avenue dump site?

16 A I am not sure at this time.

17 Q Do you recall whether Graphon,
18 G-r-a-p-h-o-n, Incorporated disposed of waste at the
19 U.S. Scrap site?

20 A No, I don't think so.

21 Q Do you recall whether Graphon Incorporated
22 disposed of waste at the 9th Avenue dump site?

23 A Yes, they did.

24 Q Do you recall the location of the facility

1 from which Graphon disposed of waste at the 9th
2 Avenue dump site?

3 A 10045 Pacific Street, Franklin Park,
4 Illinois.

5 Q Do you recall the periods of time during
6 which they disposed of that waste?

7 A 1973 until 1975.

8 Q And do you recall the type of waste they
9 disposed?

10 A Acid.

11 Q Do you recall the volume of waste?

12 A 2,000 to 3,000 gallon loads, three to four
13 times a year.

14 Q Do you recall whether W.F. Hall Printing
15 Company disposed of waste at the U.S. Scrap site?

16 A Yes, they did.

17 Q Do you recall whether W.F. Hall disposed of
18 waste at the 9th Avenue dump site?

19 A Yes, they did.

20 Q Do you recall the location of the facility
21 from which they disposed of that waste?

22 A 4600 West Diversey Parkway, Chicago,
23 Illinois.

24 Q Do you recall the periods of time during

1 which they disposed of that waste?

2 A 1969 until 1975.

3 Q Do you recall the type of waste they
4 disposed of?

5 A Inks and solvents.

6 Q And do you recall the volume of waste
7 disposed?

8 A Seven or eight tanker loads a year, of
9 which there was 3,000 to 4,000 gallons in the load.

10 Q Do you recall whether Hanna Waterways
11 disposed of waste at the U.S. Scrap site?

12 A Yes, they did.

13 Q Do you recall whether Hanna Waterways
14 disposed of waste at the 9th Avenue dump site?

15 A Yes, they did.

16 Q Do you recall the location of the facility
17 from which they disposed of that waste?

18 A Route 83 and Archer Road in Lemont,
19 Illinois.

20 Q And do you recall the time period during
21 which they disposed of that waste?

22 A 1973 until 1975.

23 Q Do you recall what type of waste they
24 disposed of?

1 A Some type of oily waste from barges.

2 Q From barges?

3 A From barges, right.

4 Q Do you recall the volume of waste they
5 disposed of at those sites?

6 A 4,000- to 5,000-gallon tanker loads
7 approximately 8 to 10 times a year.

8 Q Originally, Mr. Martell, in your May
9 statement, you said 4 to 5,000-gallon loads, four to
10 five times a year. Is there any specific reason for
11 your change?

12 A No. We changed that to 8 to 10 because
13 it's in red, four to five is underneath there. So I
14 must have done more research and come up with this
15 higher estimate. And I personally asked Leroy
16 Brown; in between the paperwork and talking to Leroy
17 Brown, the driver, I came up with a higher estimate.

18 Q Do you recall ever hauling for Hanna
19 Waterways yourself, specifically, driving for
20 that --

21 A No, I didn't. But I knew where it was at,
22 and I believe I had been down there with Dave Head
23 looking at the facility, because it was kind of a
24 bad place to go in. It was, like, a muddy road and

1 there were times when we'd get stuck down there. So
2 I took a ride down to see if there was any way
3 around this.

4 MS. TIGHE: Off the record.

5 (Discussion held off the record.)

6 BY MR. KOWALSKI:

7 Q Mr. Martell, do you recall whether
8 Hendrickson Manufacturing Company disposed of waste
9 at the U.S. Scrap site?

10 A Yes, they did.

11 Q Do you recall whether they disposed of
12 waste at the 9th Avenue dump site?

13 A Yes, they did.

14 Q Do you recall the location of the facility
15 from which they disposed of that waste?

16 A 8001 West 47th Street, Lions, Illinois.

17 Q And do you recall the time period during
18 which they disposed of that waste?

19 A 1973 until 1975.

20 Q Do you recall the type of waste disposed?

21 A Oil, solvents and paints.

22 Q Do you recall the volume of waste disposed
23 at those two sites?

24 A 2,000 gallons, approximately, at a time in

1 tankers four to five times a year.

2 Q Do you recall whether Heritage Ink disposed
3 of waste at the U.S. Scrap site?

4 A Yes, they did.

5 Q Do you recall whether Heritage Ink disposed
6 of waste at the 9th Avenue dump site?

7 A Yes, they did.

8 Q Do you recall the location of the facility
9 from which Heritage Ink disposed of that waste?

10 A 310 Gerri Lane, G-e-r-r-i, Lane, Addison,
11 Illinois.

12 Q And do you recall the time period during
13 which they disposed of that waste?

14 A I'm not sure at this time.

15 Q Do you recall the type of waste disposed of
16 at the two sites?

17 A Inks and solvents.

18 Q And do you recall the volume of waste?

19 A 40 to 60 drums, two to three times a year.

20 Q Do you recall whether Hills-McCanna
21 disposed of waste at the U.S. Scrap site?

22 A Yes, they did.

23 Q Do you recall whether they disposed of
24 waste at the 9th Avenue dump site?

1 A Yes, they did.

2 Q And do you recall the location of the
3 facility which disposed of those wastes?

4 A 400 Maple Street, Carpentersville,
5 Illinois.

6 Q Do you recall the time periods during which
7 they disposed of those wastes?

8 A 1973 until 1975.

9 Q And do you recall the type of waste
10 disposed?

11 A Oil.

12 Q And do you recall the volume of waste?

13 A One to two, 5,000-gallon tanker loads a
14 month.

15 Q Do you recall if Hodson, H-o-d-s-o-n,
16 Corporation disposed of waste at the U.S. Scrap
17 site?

18 A Not at this time.

19 Q Do you recall whether Hodson Corporation
20 disposed of waste at the 9th Avenue dump site?

21 A Not at this time.

22 Q Do you recall whether E.F. Houghton,
23 H-o-u-g-h-t-o-n, Company disposed of waste at the
24 U.S. Scrap site?

1 A Not at this time.

2 Q Do you recall whether they disposed of
3 waste at the 9th Avenue dump site?

4 A Not at this time.

5 Q Do you recall whether Hoener-Waldorf
6 disposed of waste at the U.S. Scrap site?

7 A No, they didn't.

8 Q Do you recall whether Hoener-Waldorf
9 disposed of waste at the 9th Avenue dump site?

10 A Yes, they did.

11 Q Do you recall the location of the facility
12 from which they disposed of that waste?

13 A Route 6 and Young Road, Joliet, Illinois.

14 Q And do you recall the time period during
15 which they disposed of those wastes?

16 A Sometime in late 1973 or 1974.

17 Q And do you recall the type of waste it
18 involved?

19 A Chemical sludge.

20 Q Do you recall the volume of waste disposed
21 of at the 9th Avenue dump site?

22 A It was 2,000 to 4,000 gallons combined with
23 a Vac All and a vacuum tanker. And I was there
24 myself at this jobsite. This was a one-time job

1 that we did.

2 Q Do you recall whether the Hotpoint Division
3 of General Electric disposed of waste at the U.S.
4 Scrap site?

5 A Yes, they did.

6 Q Do you recall whether they disposed of
7 waste at the 9th Avenue dump site?

8 A Yes, they did.

9 Q Do you recall the location of the facility
10 from which that waste was disposed?

11 A 1543 South 54th Avenue, Cicero, Illinois.

12 Q And do you recall the periods of time
13 during which that waste was disposed?

14 A 1970 until 1975.

15 Q And do you recall the type of waste
16 disposed?

17 A Paint and solvents.

18 Q Do you recall the volume of waste disposed
19 of at the two sites?

20 A Thirty to forty drums at a time, two to
21 three times a year. And then there was 2,000 to
22 3,000 gallons taken out in a tankers, two or three
23 times a year.

24 Q Do you recall whether Howell Company

1 disposed of waste at the U.S. Scrap site?

2 A Yes, they did.

3 Q Do you recall whether they disposed of
4 waste at the 9th Avenue dump site?

5 A Yes, they did.

6 Q Do you recall the location from which they
7 disposed of that waste?

8 A 410 South First Street, St. Charles,
9 Illinois.

10 Q And do you recall the time periods during
11 which that waste was disposed of?

12 A Approximately 1972 until 1975.

13 Q Do you recall the type of waste disposed?

14 A Acid waste.

15 Q And do you recall the volume of waste
16 disposed over that time?

17 A 1,000 to 2,000 gallons in a tanker, one or
18 two times a month.

19 Q Do you recall the nature of that company's
20 business, Mr. Martell?

21 A No, I don't. I think it's furniture. I
22 think it's metal furniture, office furniture,
23 something like that, but I am not really sure.

24 Q Do you recall whether Hunt and Wesson

1 disposed of any waste at the U.S. Scrap site?

2 A Not at this time.

3 Q And do you recall Hunt and Wesson disposing
4 of any waste at the 9th Avenue dump site?

5 A Not at this time.

6 Q Do you recall any attempt to generate
7 business from Hunt and Wesson?

8 A Yes, I remember distinctly talking to Dave
9 Head at dinner, discussing accounts we'd like to
10 get, or accounts he landed, to change the price on.
11 And he mentioned that we stood a pretty good chance
12 of getting Hunt and Wesson. And I heard the name.
13 That was a big company. But whether or not we
14 actually did get the business, I'm not sure.

15 Q Do you recall whether International
16 Minerals and Chemicals disposed of any waste at U.S.
17 Scrap site?

18 A Yes, they did.

19 Q Do you recall whether International
20 Minerals and Chemicals disposed of any waste at the
21 9th Avenue dump site?

22 A Yes, they did.

23 Q Do you recall the location of the facility
24 from which they disposed of that waste?

1 A 400 East Cottage Avenue, Carpentersville,
2 Illinois.

3 Q Do you recall what periods of time that
4 waste was disposed?

5 A 1972 until 1975.

6 Q And do you recall the type of waste
7 disposed?

8 A Varnishes, resins, oils and solvents.

9 Q And do you recall the volume of waste
10 disposed over that time period?

11 A Approximately a trailer load of drums about
12 every 60 days or so.

13 MS. TIGHE: Off the record.

14 (Discussion held off the record.)

15 BY MR. KOWALSKI:

16 Q When you said -- Mr. Martell, was
17 International Minerals and Chemicals affiliated with
18 any other companies, to the best of your knowledge?

19 A I believe they were associated, or owned
20 by, Stressan-Reuter Company in Bensenville,
21 Illinois, until 1973.

22 Q And what happened in 1973?

23 A Well, then, I think it's Lawter Chemicals,
24 bought the Stressan-Reuter business, or plant, or

1 whatever you want to call it.

2 Q Do you recall whether ITT Harper
3 Corporation disposed of any waste at U.S. Scrap
4 site?

5 A Not at this time.

6 Q Do you recall whether ITT Harper
7 Corporation disposed of any waste at the 9th Avenue
8 dump site?

9 A Not at this time.

10 Q Do you recall whether Illinois Bronze
11 Coatings disposed of any waste at the U.S. Scrap
12 site?

13 A Yes, they did.

14 Q Do you recall whether Illinois Bronze
15 Coatings disposed of any waste at the 9th Avenue
16 dump site?

17 A Yes, they did.

18 Q Do you recall the location of the facility
19 from which they disposed of those wastes?

20 A 300 East Main Street, Lake Zurich,
21 Illinois.

22 Q Do you recall the period of time during
23 which they disposed of the waste at those two sites?

24 A 1972 until 1975.

1 Q And do you recall the type of waste
2 disposed?

3 A Paints, solvents, varnishes and powders.

4 Q Do you recall the volume of waste disposed
5 over that time period?

6 A 50 to 60 drums in a load, three to four
7 loads per year.

8 Q Do you recall whether Industrial Hard
9 Chrome disposed of waste at the U.S. Scrap site?

10 A I don't think so.

11 Q Do you recall whether Industrial Hard
12 Chrome disposed of waste at the 9th Avenue dump
13 site?

14 A Yes, they did.

15 Q And do you recall the location of the
16 facility from which those wastes were disposed?

17 A 901 Greenleaf Avenue, Elk Grove Village,
18 Illinois.

19 Q And do you recall the time period during
20 which those wastes were disposed?

21 A 1973 until 1975.

22 Q And do you recall what type of wastes were
23 disposed?

24 A Some form of acid waste.

1 Q And do you recall the volume of waste
2 disposed over that period of time?

3 A 3,000 to 4,000 gallons in a tanker load
4 about once a month.

5 Q Do you recall whether the Institute of Gas
6 Technology disposed of any waste at the U.S. Scrap
7 site?

8 A Yes, they did.

9 Q Do you recall whether they disposed of in
10 ways at the 9th Avenue dump site?

11 A Yes, they did.

12 Q Do you recall the location the facility
13 from which those wastes were disposed?

14 A Approximately about 35th and Pulaski Road
15 in Chicago, Illinois.

16 Q Do you recall the period of time during
17 which those wastes were disposed?

18 A 1972 until 1975.

19 Q Do you recall the type of wastes disposed?

20 A Chemicals, sludges and waste treatment
21 chemicals.

22 Q Do you recall the nature of the process or
23 manufacturing that generated that waste?

24 A I believe this was owned by People's Gas

1 Company. And what they had there was a pilot plant
2 taking coal and making gas out of it. Gasification
3 plant, I think they called it.

4 Q Do you recall the the volume of waste
5 generated during that period of time?

6 A Well, at times there was a lot. And then
7 at times then it would go down a little bit. And
8 the high time there might be as high as three, 5,000
9 gallon-tankers -- Oh, 3,000 -- Wait a minute. I
10 said that wrong. How do I go back?

11 Q Tell me the volume of wastes that were
12 generated?

13 A 3,000 to 5,000 gallons in a tanker load,
14 three to five times a week.

15 Q Mr. Martell, so that the record is clear,
16 as you're giving your deposition, you're also
17 reviewing your prior statement, is that correct?

18 A Yes, I am.

19 Q As well as additional notes you've made
20 since the giving of that statement?

21 A Yes, I am.

22 Q Do you know whether Interlake Steel Company
23 ever disposed of waste at the U.S. Scrap site?

24 A Yes, they did.

1 Q And do you know whether Interlake Steel
2 Company disposed of waste at this 9th Avenue dump
3 site?

4 A Yes, they did.

5 Q And do you know the location of the
6 facility where Interlake Steel generated those
7 wastes?

8 A 13th Street in Riverdale, Illinois.

9 Q And do you recall the time period during
10 which they disposed of those wastes?

11 A 1971 and 1974.

12 Q Do you recall the type of waste disposed?

13 A Oil.

14 Q And do you recall the the volume of wastes
15 disposed over that period of time?

16 A 1 to 2,000 gallons of oil waste in a tanker
17 load, one or two times a year. That would be from
18 the factory, and then one time they spilled a whole
19 bunch of oil in the Calumet River and the Vac All
20 had to remove it.

21 Q Do you recall when that spill was?

22 A When?

23 Q Yes.

24 A I am going to say '71, '71 or '72. It

1 might be '72 because that was a Vac All.

2 Q And do you recall the size of the waste
3 cleaned up and disposed in that spill?

4 A In the spill? 2 to 3,000 gallons.

5 Q And that was oil?

6 A What did you say?

7 Q That was oil?

8 A That was oil, too, yes, sir.

9 Q Do you recall whether International
10 Harvester Company ever disposed of waste at the U.S.
11 Scrap site?

12 A Yes, they did.

13 Q Do you recall whether they ever disposed of
14 waste at the 9th Avenue dump site?

15 A Yes, they did.

16 Q Do you recall the location of the facility
17 which disposed of those wastes?

18 A It was called West Pullman Works, and it's
19 at 1015 West 120th Street, Chicago, Illinois.

20 Q Were there any other facilities for
21 International Harvester Company that disposed of
22 waste?

23 A We used Vac Alls and vacuum tankers at
24 Wisconsin Steel, which was International Harvester,

1 but I don't really remember exactly if the stuff we
2 took out was a liquid. I know for sure we took out
3 from the sand filters, but I don't remember if we
4 got the liquid, too.

5 Q When you say "the sand filters" what would
6 be the nature of that waste? Would it be sand?

7 A It would be sand.

8 Q What was it filtering?

9 A It was filtering the water.

10 Q So you would dispose of the sand from
11 Wisconsin Steel?

12 A Right.

13 Q And what period of time did you handle that
14 account?

15 A From Wisconsin Steel?

16 Q Yes.

17 A 1972, 1973.

18 Q That would go to which site or sites?

19 A U.S. Scrap site, close.

20 Q Do you recall the volume of waste you took
21 out of Wisconsin Steel?

22 A No, I don't.

23 Q Where was that facility located?

24 A 106th and Torrence Avenue, Chicago.

1 Q Switching back now to the International
2 Harvester facility on 120th Street, what period of
3 time did you disposing of that waste?

4 A 1973 until 1975.

5 Q And what type of waste was that?

6 A Acid waste.

7 Q And what volume of waste was disposed?

8 A About 4,000 gallons in a tanker load, two
9 to three times a week.

10 Q Do you recall whether International Multi
11 Foods disposed of any waste at the U.S. Scrap site?

12 A Yes, they did.

13 Q Do you recall whether International Multi
14 Foods disposed of waste at the 9th Avenue dump site?

15 A Yes, they did.

16 Q Do you recall the location of the facility
17 which disposed of those wastes?

18 A 2,000 North George Street, Melrose Park,
19 Illinois.

20 Q Do you recall the period of time of which
21 International Multi Foods disposed of waste at those
22 two sites?

23 A 1972 until 1975.

24 Q Do you recall the type of that waste?

1 A Coconut oil waste.

2 Q Was there anything other than food type
3 waste?

4 A I'm not sure. I don't think so, but I'm
5 not sure.

6 Q Do you recall the volume of waste disposed
7 of over that time period?

8 A 1 to 3,000 gallon tanker loads each month.

9 Q Do you recall whether Illinois Tool Works
10 disposed of waste at the U.S. Scrap site?

11 A Yes, they did.

12 Q Do you recall whether they disposed of
13 waste at the 9th Avenue dump site?

14 A Yes, they did.

15 Q Do you recall the location of the facility
16 which disposed of those wastes?

17 A 8501 West Higgins Road, Chicago, Illinois.

18 Q And do you recall the period of time during
19 which it disposed of those wastes?

20 A 1972 until 1975.

21 Q Do you recall the type of waste?

22 A Some type of oil.

23 Q Do you recall the volume of waste disposed
24 over that time period?

1 A A load of 30 to 40 drums, two to three
2 times a year and 3 to 4,000 gallon loads in a tanker
3 two to three times a year.

4 Q When you say 3 to 4,000-gallon loads, do
5 you mean 3,000 to 4,000 gallons?

6 A Yes.

7 MS. TIGHE: Off the record.

8 (Discussion held off the record.)

9 (Whereupon this deposition was
10 adjourned and continued on November
11 22, 1988 at 10:00 a.m.)

12

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24

1 UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
2 REGION V

3 IN RE THE MATTER OF:)
4 U.S. SCRAP CORPORATION)
Chicago, Illinois)
5 and)
6 9th AVENUE DUMP)
Gary, Indiana)
7

8 I, STEVE MARTELL, state that I have
9 read the foregoing transcript of the testimony given
10 by me at my deposition on the 21st day of November,
11 1988, and that said transcript constitutes a true
12 and correct record of the testimony given by me at
13 said deposition except as I have so indicated on the
14 errata sheets provided herein.

15
16 _____
Steve Martell

17 No corrections (Please initial) _____
18 Number of errata sheets submitted _____ (pages.)

19 SUBSCRIBED AND SWORN TO
20 before me this _____ day
of _____, A.D., 1988.

21 _____
Notary Public
22
23
24

1 STATE OF ILLINOIS)
) SS.
2 COUNTY OF C O O K)

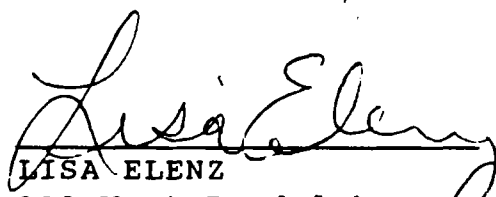
3
4 I, LISA ELENZ, CSR, a notary public in
5 and for the County of Cook and State of Illinios, do
6 hereby certify that STEVE MARTELL was by me first
7 duly sworn to testify to the truth, the whole truth,
8 and nothing but the truth, and that the above
9 deposition was recorded stenographically by me and
10 reduced to typewriting by me.

11
12 I FURTHER CERTIFY that the foregoing
13 transcript of the said deposition is a true,
14 correct, and complete transcript of the testimony
15 given by the said witness at the time and place
16 specified hereinbefore.

17
18 I FURTHER CERTIFY that I am not a
19 relative or employee or attorney or counsel of any
20 of the parties, nor a relative or employee of such
21 attorney or counsel, or financially interested
22 directly or indirectly in this action.

1 I FURTHER CERTIFY that my certificate
2 annexed hereto applies to the original and typed
3 transcripts only, signed and certified transcripts
4 only. I assume no responsibility for the accuracy
5 of any reproduced copies not made under my control
6 or direction.

7
8 IN WITNESS WHEREOF, I have hereunto
9 set my hand and affixed my seal of office at
10 Chicago, Illinios, this 28th of November, A.D.,
11 1988.

12
13 
14 LISA ELENZ
15 318 West Randolph
Chicago, Illinois 60601
(312) 984-1033

16 C.S.R. License No. 084-003177

17 My notary commission
18 expires December 24 1990.

19
20 " OFFICIAL SEAL
LISA ELENZ
21 NOTARY PUBLIC, STATE OF ILLINOIS
MY COMMISSION EXPIRES 12/24/90.
22
23
24

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

In Re the Matter of:)
)
U.S. SCRAP CORPORATION)
Chicago, Illinois)
)
and)
)
9th AVENUE DUMP)
Gary, Indiana)

The discovery deposition of STEVE
MARTELL, taken in the above-entitled cause, before
Maria Miramontes, C.S.R., a Notary Public within
and for the County of Cook and State of Illinois
at 33 North Dearborn Street, Suite 903, Chicago,
Illinois, on November 22, 1988, at the hour of
10:00 o'clock a.m.

BAKER, FENNELL & ASSOCIATES, INC.

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REPORTED BY: MARIA MIRAMONTES, CSR

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Appeared on behalf of Steve Martell

10 ALSO PRESENT:

11 MR. MARK D. THOMAS.

12
13 * * * * *14 I N D E X15 EXAMINATIONS PAGE

16 WITNESS: STEVE MARTELL

17 Examination by Mr. Kowalski 3

18 Examination by Ms. Tighe 361

19 Further Examination by Mr. Kowalski 363

20 MARTELL DEPOSITION EXHIBITS PAGE

21 No. 2 341

22 No. 3 346

23 No. 4 354

24

1 MR. KOWALSKI: On the record. Mr. Martell, I
2 just want to remind you you are still under oath
3 from yesterday, and we'll be continuing where we
4 left off with your deposition yesterday. Okay?

5 THE WITNESS: Okay.

6 MR. KOWALSKI: And the instructions I gave you
7 yesterday regarding keeping your answers aloud and
8 letting me know if you don't understand anything
9 still applies.

10 THE WITNESS: Yes.

11 EXAMINATION

12 BY MR. KOWALSKI:

13 Q Mr. Martell, do you know whether J.M.
14 Huber Ink Company disposed of waste at the U.S.
15 Scrap site?

16 A Yes, they did.

17 Q Do you know whether J.M. Huber Ink
18 Company disposed of waste at the 9th Avenue Waste
19 Company?

20 A Yes, they did.

21 Q Do you recall the facility where that
22 waste was generated?

23 A First Avenue and Route 66, McCook,
24 Illinois.

1 Q Do you recall the time period during
2 which that waste was disposed?

3 A 1965 until 1975.

4 Q And do you recall the type of waste
5 involved?

6 A Inks, resins and solvents.

7 Q Do you recall the volume of the waste
8 disposed during that time period?

9 A One to two semi-trailer loads of drums
10 per month. And I went there myself many times and
11 picked up loads with the truck. I drove the
12 truck, and I actually loaded the truck.

13 Q Do you recall whether Janette and Company
14 ever disposed of waste at the U.S. Scrap site?

15 A Not at this time.

16 Q Do you recall whether Janette and Company
17 disposed of waste at the 9th Avenue Dump site?

18 A Not at this time.

19 Q Do you recall whether Janette and Company
20 was ever a customer of yours in relation with any
21 other business or operations?

22 A I think it's a customer of U.S. Drum.

23 Q Do you recall whether Jet Die Castings
24 ever disposed of waste at the U.S. Scrap site?

1 A I am not sure about the U.S. Scrap site.

2 Q Do you know whether Jet Die Castings ever
3 disposed of waste at the 9th Avenue Dump site?

4 A Yes, they did.

5 Q Do you recall the location of the
6 facility that disposed of the waste at the 9th
7 Avenue Dump site?

8 A 850 Elmhurst Road, Elk Grove Village,
9 Illinois.

10 Q And do you recall the time period during
11 which that waste was disposed?

12 A Approximately 1974, 1975.

13 Q Do you recall the type of waste involved?

14 A I am not sure at this time.

15 Q And do you recall the volume of waste
16 disposed?

17 A I don't have any recollection at this
18 time.

19 Q Do you know whether Jewel Paint Company
20 disposed of waste at the U.S. Scrap site?

21 A I am not sure on the U.S. Scrap site --
22 wait a while.

23 MS. TIGHE: Off the record.

24 (Discussion held off the record.)

1 BY MR. KOWALSKI:

2 Q Mr. Martell, do you want to change your
3 answer to that question?

4 A Yes. I was a little confused on some of
5 my notes here, and it's really yes on the U.S.
6 Scrap site.

7 Q Okay. Do you know whether Jewel Paint
8 Company disposed of wastes at the 9th Avenue Dump
9 site?

10 A Yes, they did. And on that matter, I
11 loaded the truck at Jewel Paint on Western Avenue
12 some time in 1966, '67 or '68. It was a roll-off
13 truck and we set it on the street and they brought
14 the drums out.

15 Q You said it was on Western Avenue. Do
16 you recall the specific address?

17 A 345 North Western Avenue, Chicago,
18 Illinois.

19 Q And what was it that they disposed of?

20 A Paints and varnishes in drums.

21 Q Okay. And was that one occasion or --

22 A I am not really sure the exact number,
23 but, the best I can remember, it's like one to
24 three loads. For sure the one load, and there

1 were 40 to 50 drums in each load.

2 Q You, in particular, were involved with
3 loading one of those loads?

4 A Yes, I was.

5 Q Do you know whether Jones and Cleary
6 Roofing Company disposed of waste at the U.S.
7 Scrap site?

8 A Yes, they did.

9 Q Do you know whether Jones and Cleary
10 Roofing Company disposed of waste at the 9th
11 Avenue Dump site?

12 A No, they did not.

13 Q Do you recall the address of the facility
14 that disposed of waste at the U.S. Scrap site?

15 A No, I just -- I don't have the exact
16 address, just Chicago, someplace in Chicago,
17 Illinois. And actually, the material would be
18 generated from roofs that they were re-roofing all
19 over the city of Chicago.

20 Q Would there have been any material
21 disposed of at the U.S. Scrap site other than dry
22 roofing debris?

23 A No, I don't believe so. I think it was
24 just from the Vac Alls sucking the roofing pebbles

1 and the dirt off the roofs.

2 Q Do you recall the time period during
3 which Jones and Cleary disposed of waste at the
4 U.S. Scrap site?

5 A Approximately 1972 to 1973.

6 Q And do you recall the volume disposed
7 during that time period?

8 A I don't remember at this time.

9 Q Do you know whether the Kitchens of Sara
10 Lee disposed of waste at the U.S. Scrap site?

11 A Yes, they did.

12 Q Do you know whether the Kitchens of Sara
13 Lee disposed of waste at the 9th Avenue Dump site?

14 A Yes, they did,

15 Q Do you recall the location of the
16 facility that disposed of that waste?

17 A 500 Waukegan Road, Deerfield, Illinois.

18 Q Do you recall the time period during
19 which that waste was disposed?

20 A 1972 until 1975.

21 Q And do you recall the type of waste?

22 A Some sort of food waste in vacuum
23 tankers.

24 Q Do you recall any waste other than food

1 waste?

2 A No, I don't.

3 Q Do you recall the volume of waste that
4 was disposed at those two sites?

5 A Let's say three to five 5,000-gallon
6 tankers a week. Incidentally, Sara Lee is a
7 division -- or Consolidated Foods Corporation.

8 Q Okay. Mr. Martell, in your previous
9 statement, you stated that the volume disposed was
10 approximately one 5,000-gallon tanker a day. Is
11 there any particular reason for the change in
12 volume?

13 A The only reason I changed that is
14 nothing, you know, except I keep looking over
15 papers and sometimes I have a second thought and I
16 say, "Well, there are times when the volume
17 doesn't go exactly like that in a straight pattern
18 and, you know, there are slower periods and
19 faster." So, to be more fair, I just said three
20 to five. It almost results to the same thing.

21 Q Do you know whether Lake River Terminals
22 disposed of any waste at the U.S. Scrap site?

23 A Yes, they did.

24 Q Do you know whether Lake River Terminals

1 disposed of waste at the 9th Avenue Dump site?

2 A No, they didn't.

3 Q Do you know the location of the facility
4 that disposed of the waste at the U.S. Scrap site?

5 A 5005 South Harlem Avenue and it's Berwyn,
6 Illinois.

7 Q And do you recall the time period during
8 which that waste was disposed?

9 A I would say approximately 1970 until
10 1973.

11 Q Do you recall the type of waste disposed
12 at the U.S Scrap Site?

13 A Anti-freeze and some other chemicals in
14 drums and then a one-time oil cleanup with the Vac
15 Alls from the Chicago Shipping Canal or whatever
16 you call that thing. We sucked the oil off the
17 water and then disposed of that.

18 Q Do you recall the volume of the drums and
19 the sanitary canal cleanup?

20 A I believe there was one load of drums of
21 anti-freeze for sure, and in talking to LeRoy
22 Brown, between us, we think there is like about
23 two or three loads involved. I drove one of the
24 loads myself. And then there was the one Vac All

1 load of about 2,000 gallons of oil from the river.

2 Q Do you know whether LaSalle Management
3 Company disposed of any waste at the U.S. Scrap
4 site?

5 A Yes, they did.

6 Q Do you recall whether LaSalle Management
7 Company disposed of waste at the 9th Avenue Dump
8 site?

9 A Yes, they did.

10 Q Do you recall the location of the
11 facility that disposed of those wastes?

12 A I believe it's the LaSalle National Bank
13 Building.

14 Q And do you recall the time period during
15 which the wastes were disposed?

16 A 1968 to 1974.

17 Q Do you recall the type of wastes
18 disposed?

19 A Just rubbish and paper.

20 Q You don't recall any kind of liquid
21 waste?

22 A No, not to the best of my knowledge at
23 this time.

24 Q Do you recall the volume of waste

1 involved?

2 A No, I don't.

3 Q Do you know whether Leavitt Tube Company
4 disposed of waste at the U.S. Scrap site?

5 A Yes, they did.

6 Q Do you recall whether Leavitt Tube
7 Company disposed of any waste at the 9th Avenue
8 Dump site?

9 A Yes, they did.

10 Q Do you recall the location of the
11 facility that disposed of those wastes?

12 A 1717 West 115th Street, Chicago,
13 Illinois.

14 Q Do you recall the time period during
15 which that waste was disposed?

16 A 1973 until 1975.

17 Q And do you recall the type of waste?

18 A Some form of acid waste.

19 Q Do you recall the volume of waste
20 disposed over that time period?

21 A One 4,000- to 5,000-gallon tanker load
22 every other month.

23 Q Do you know whether Libby MacNeal, Libby
24 ever disposed of any waste at the U.S. Scrap site?

1 A Yes, they did.

2 Q Do you know whether Libby MacNeal, Libby
3 disposed of waste at the 9th Avenue Dump site?

4 A Yes, they did.

5 Q Do you recall the location of the
6 facility that disposed of those wastes?

7 A 119th Street and Ashland Avenue, Chicago,
8 Illinois.

9 Q Do you recall the time period during
10 which those wastes were disposed?

11 A 1971 until 1975.

12 Q Do you recall the type of wastes?

13 A Grease and oily food waste.

14 Q Do you recall whether there was any waste
15 disposed of other than food waste?

16 A No, I am not sure at this time.

17 Q Do you recall the volume of waste
18 disposed during that time period?

19 A Two to three tanker loads per month, and
20 a tanker load had approximately 4,000 to 5,000
21 gallons on each load.

22 Q Do you know whether Lindbloom High School
23 disposed of any waste at the U.S. Scrap site?

24 A No, they didn't.

1 Q Do you know whether Lindbloom High School
2 disposed of any waste at 9th Avenue Dump site?

3 A Yes, they did.

4 Q Do you recall the location of that high
5 school?

6 A Some place around 62nd and Wood Street on
7 the South Side of Chicago.

8 Q And do you recall the time period during
9 which the waste was disposed at the 9th Avenue
10 Dump site?

11 A Some time in 1975.

12 Q Do you recall the type of waste disposed?

13 A I believe it was laboratory samples.

14 Q And do you know what was in those
15 laboratory samples?

16 A No. I have no idea.

17 Q And do you recall the volume of waste
18 disposed?

19 A No. It would be just what we call a
20 small load, you know, like it would fit in the
21 pickup truck or something like that.

22 Q Do you have a particular recollection of
23 that load?

24 A No. I just remember, you know, remarking

1 and talking about it and in talking to David Head
2 about the load, and the reason that I remembered
3 is that we thought that this might be a new form
4 of business, that there is a lot of this kind of
5 pickups out there.

6 Q Do you know whether Lawter Chemical
7 Company ever disposed of any waste at the U.S.
8 Scrap site?

9 MS. TIGHE: Off the record.

10 (Discussion held off the record.)

11 BY MR. KOWALSKI:

12 Q Go ahead, Mr. Martell.

13 A Yes, they did. Let's see what else. But
14 under their subsidiary which they purchased
15 Stressan-Reuter from Bensenville, Illinois.

16 Q Do you recall whether Lawter Chemical
17 Company disposed of any waste at the 9th Avenue
18 Dump site?

19 A Yes, they did.

20 Q Do you recall the location of the
21 facility that disposed of that waste?

22 A The Lawter Chemical address for that that
23 disposed of the waste at the 9th Avenue site is
24 990 Skokie Boulevard, Northbrook, Illinois.

1 Q Do you recall the time period during
2 which that waste was disposed?

3 A 1973 until 1975.

4 Q And do you recall the types of waste
5 disposed?

6 A It's ink, paint, ink base and resins.

7 Q And do you recall the volume of waste
8 disposed during that time period?

9 A I am not sure at this time.

10 Q Do you know whether MacLean-Fogg Company
11 disposed of any waste at the U.S. Scrap site?

12 A Yes, they did.

13 Q Do you recall whether MacLean-Fogg
14 Company disposed of waste at the 9th Avenue Dump
15 site?

16 A Yes, they did.

17 Q Do you recall the location of the
18 facility that disposed of those wastes?

19 A It's 1000 Allenson Road, Mundelein,
20 Illinois.

21 Q And do you recall the time period during
22 which those wastes were disposed?

23 A 1973 until 1975.

24 Q Do you recall the type of wastes

1 disposed?

2 A Some type of oil.

3 Q Do you recall the volume of waste
4 disposed during that time period?

5 A One to two 5,000-gallon tanker loads per
6 month.

7 Q Do you know whether Magee Chemical
8 disposed of any waste at the U.S. Scrap site?

9 A No, I don't believe they did. Oh, wait a
10 while. I got the wrong line. I am sorry.

11 Q You were looking at the wrong line on
12 your paper?

13 A Yes. I was looking at Marathon Oil
14 Company. I am sorry. Yes, they did.

15 Q Do you recall whether Magee Chemical
16 disposed of any waste at the 9th Avenue Dump site?

17 A Yes, they did.

18 Q Do you recall the location of the
19 facility that disposed of those wastes?

20 A 415 West Touhy Avenue, Des Plaines,
21 Illinois.

22 Q And do you recall the time period during
23 which those wastes were disposed?

24 A 1972 until 1975.

1 Q Do you recall the type of waste disposed?

2 A I believe it's some type of acid.

3 Q And do you recall the volume of waste
4 disposed during that time period?

5 A Approximately one to two 4,000-gallon
6 loads per month.

7 Q Do you know whether Marathon Oil Company
8 disposed of any waste at the U.S. Scrap site?

9 A No, they didn't.

10 Q Do you know whether Marathon Oil Company
11 disposed of waste at the 9th Avenue Dump site?

12 A Yes, they did.

13 Q Do you recall the location of the
14 facility that disposed of those wastes?

15 A I believe it's Griffith, Indiana. It's
16 like a tank farm.

17 Q Do you recall the time period during
18 which Marathon Oil disposed of those wastes?

19 A Approximately 1974 to 1975.

20 Q Do you recall the type of waste?

21 A Contaminated gasoline and dirty elements
22 from the bottom of a huge storage tank that we
23 cleaned out using Vac Alls and vacuum tankers.

24 Q Do you recall the volume of waste that

1 was disposed at 9th Avenue Dump?

2 A No, I am not sure at this time.

3 Q Do you know whether Martin Senour Paint
4 Company disposed of waste at the U.S. Scrap site?

5 A Yes, they did.

6 Q Do you know whether Martin Senour Paint
7 Company disposed of waste at the 9th Avenue Dump
8 site?

9 A Yes, they did.

10 Q Do you know the location of the facility
11 from which Martin Senour disposed of those wastes?

12 A 2500 Senour Avenue, Chicago, Illinois.

13 Q And do you recall the time period during
14 which they disposed of those wastes?

15 A Approximately 1972 until 1975.

16 Q Do you recall the types of waste
17 disposed?

18 A Solvents and paints.

19 Q Do you recall the volume of wastes
20 disposed during those years?

21 A One to two 4,000-to 5,000-gallon tanker
22 loads each month. And I was at that factory, too,
23 not as a driver, but I accompanied the trucker a
24 couple times to see how we could set our tanker in

1 a better spot.

2 Q Do you recall whether Matherson, Selig
3 disposed of any waste at the U. S. Scrap Site?

4 A Yes, they did.

5 Q Do you know whether Matherson, Selig
6 disposed waste at the 9th Avenue Dump site?

7 A Yes, as their new entity Coldwell
8 General. They were purchased in -- I believe it's
9 1973 or somewhere about then.

10 Q Okay. You previously gave us information
11 regarding Coldwell General. Would that
12 information apply to Matherson, Selig after 1973?

13 A Yes, it does.

14 MS. TIGHE: Off the record.

15 (Discussion held off the record.)

16 MR. KOWALSKI: Back on.

17 BY MR. KOWALSKI:

18 Q Mr. Martell, do you know whether MaGraw
19 Edison disposed of waste at the U.S. Scrap site?

20 A Yes, they did.

21 Q Do you recall whether MaGraw Edison
22 disposed of waste at the 9th Avenue Dump site?

23 A No, they did not.

24 MR. THOMAS: Off the record.

1 (Discussion held off the record.)

2 MR. KOWALSKI: Can you read back the last
3 question and answer, please.

4 (Record read.)

5 BY MR. KOWALSKI:

6 Q Mr. Martell, do you recall the location
7 of the facility that disposed of those wastes at
8 U.S. Scrap?

9 A It was on West 65th Street in Bedford
10 Park. I am going to say about four blocks west of
11 Cicero, but the Illinois Industrial Directory does
12 not list the exact address for some reason.

13 Q Do you recall the time period during
14 which those wastes were disposed?

15 A 1965 to 1968. And, incidentally, I
16 believe it was called the Tropic Air Division,
17 this particular plant.

18 Q Okay. Did you go to that facility
19 yourself?

20 A Yes, I did. Many times.

21 Q Do you recall the type of waste involved?

22 A It was industrial waste, mostly solid.

23 Q Was there some liquid waste?

24 A As best as I can remember, you know,

1 lately that -- in the end when they closed it down
2 and they moved to Elgin to their main factory
3 there was a tremendous cleanup. In them last
4 loads there was, you know, paint and stuff like
5 that in there but small amounts, though, you know.

6 Q Do you recall the volume of waste
7 disposed at the U.S. Scrap site?

8 A Not at this time.

9 Q Do you know whether Midwest Brass
10 disposed of waste at the U.S. Scrap site?

11 A Yes, they did.

12 Q Do you know whether Midwest Brass
13 disposed of waste at the 9th Avenue Dump site?

14 A Yes, they did.

15 Q Do you recall the location of the
16 facility that disposed of those wastes?

17 A 10017 Franklin Avenue, Franklin Park,
18 Illinois.

19 Q Do you recall the time period during
20 which those wastes were disposed?

21 A 1973 until 1975.

22 Q Do you recall the types of waste?

23 A Some sort of acid.

24 Q Do you recall the volume of waste

1 disposed during that time period?

2 A Approximately 2,000 to 3,000 gallons in a
3 tanker every few months.

4 Q Do you know whether Midwest Wrecking
5 disposed of any waste at the U.S. Scrap site?

6 A Yes, they did.

7 Q Do you know whether Midwest wrecking
8 disposed of any waste at the 9th Avenue Dump site?

9 A Yes, they did.

10 Q Do you recall the location of the
11 facility from which those wastes were disposed?

12 A It was from demolition jobs all over
13 Chicago and suburbs.

14 Q Do you recall the time period during
15 which those wastes were disposed?

16 A 1972 until 1975.

17 Q Do you recall the type of waste involved?

18 A Building debris, which would be wood and
19 concrete and steel and iron and things like that.

20 Q Do you recall any liquid waste?

21 A No, I don't.

22 Q And do you recall the volume of waste
23 disposed?

24 A It was on an every-day basis.

1 Q Do you know whether Mobil Company
2 disposed of any waste at the U.S. Scrap site?

3 A Yes, they did.

4 Q Do you know whether Mobil Company
5 disposed of any waste at the 9th Avenue Dump site?

6 A No, I don't think so.

7 Q Do you recall the location of the
8 facility which disposed of those wastes?

9 A I believe it's 901 North Greenwood
10 Street, Kankakee, Illinois.

11 Q Do you recall the time period during
12 which those wastes were disposed?

13 A Approximately 1970 until 1972.

14 Q Do you know the type of waste disposed?

15 A Paints, solvents, oils and thinners.

16 Q And do you recall the volume of waste
17 disposed during that time period?

18 A Since I made my statement and in talking
19 to the drivers, by drivers I mean LeRoy Brown, we
20 estimated -- I estimated about 10 to 12 trailer
21 loads. And I was there on a couple of occasions
22 myself. We figured out the truck we used and the
23 trailer we used and somewhere around 10 to 12
24 trailer loads.

1 MR. KOWALSKI: Off the record:

2 (Discussion held off the record.)

3 BY MR. KOWALSKI:

4 Q Mr. Martell, do you recall whether
5 Monsanto disposed any waste at the U.S. Scrap
6 site?

7 A Yes, they did.

8 Q Do you recall whether Monsanto disposed
9 any waste at the 9th Avenue Dump site?

10 A Yes, they did.

11 Q Do you recall the location of the
12 facility that disposed of those wastes?

13 A Muskatene, Iowa.

14 Q Do you recall the time period which
15 Monsanto disposed of those wastes?

16 A I would say somewhere around '71 or early
17 '72 until 1974.

18 Q And do you recall the type of waste
19 disposed?

20 A Ammonia and solvents I believe it is.

21 Q And do you recall the volume of wastes
22 disposed?

23 A In going back, we seemed to find that it
24 started out about a load a week and then later it

1 wert to as high as three loads a week -- three
2 tarker loads.

3 Q When you say, "tanker load," what would
4 be the size of those tankers?

5 A Oh, in this case, sir, considering the
6 distance -- I believe the stuff was light, so,
7 it's probably around 5,000 gallons.

8 MS. TIGHE: Off the record.

9 (Discussion held off the record.)

10 MR. KOWALSKI: Back on the record.

11 BY MR. KOWALSKI:

12 Q Mr. Martell, do you know whether Morton
13 Chemicals disposed of any waste at the U.S. Scrap
14 site?

15 A Yes, they did.

16 Q Do you recall whether Morton Chemicals
17 disposed of any waste at the 9th Avenue Dump site?

18 A Yes, they did.

19 Q Do you recall the location of the
20 facility from which those wastes were disposed?

21 MS. TIGHE: Off the record:

22 (Discussion held off the record.)

23 BY THE WITNESS:

24 A One plant is in Elk Grove Village and the

1 other plant is in Ringwood, Illinois.

2 BY MR. KOWALSKI:

3 Q Do you recall the time period during
4 which those wastes were disposed?

5 A The Elk Grove Village, Illinois plant was
6 from approximately 1972 until 1975. The Ringwood,
7 Illinois plant it looks like it's from about 1970
8 until 1975.

9 Q And were the wastes from those two plants
10 the same, or did they differ?

11 A No, they were very different.

12 Q Okay. Can you tell me what kind of
13 wastes were disposed?

14 A Well, the Elk Grove Village, Illinois
15 plant seemed to have like, you know, easy stuff,
16 you might say, solvents, coatings, adhesives, a
17 lot of solvents real, you know, ordinary stuff.
18 The one in Ringwood had organic and inorganic and
19 pharmaceuticals and agricultural chemicals.

20 Q And do you recall the volume of waste
21 disposed of from those two plants?

22 A About the same almost. One to two
23 trailer loads per month for each plant.

24 Q Do you know whether Motive Industries

1 disposed of any waste at the U.S. Scrap site?

2 A Yes, they did.

3 Q Do you know whether Motive Industries
4 disposed of any waste at the 9th Avenue Dump site?

5 A Yes, they did.

6 Q Do you know the location of the facility
7 from which those wastes were disposed?

8 A 5253 North Roosevelt Road, Chicago,
9 Illinois.

10 Q Do you mean North Roosevelt Road?

11 A I am sorry. That's West Roosevelt Road.

12 Q And do you recall the time period during
13 which those wastes were disposed?

14 A 1973 until 1975.

15 Q And do you know the type of waste
16 disposed?

17 A This was some sort of acid waste in
18 tankers.

19 Q And do you recall the volume of waste
20 disposed at the two sites?

21 A Approximately one 4,000-gallon tanker
22 load per month.

23 Q Do you know whether Motorwheel
24 Corporation disposed of any waste at the U.S.

1 Scrap site?

2 A Yes, they did.

3 Q Do you know whether Motorwheel
4 Corporation disposed of any waste at the 9th
5 Avenue Dump site?

6 A No, they didn't.

7 Q Do you know the location of the facility
8 that disposed of those wastes?

9 A 605 12th Street, Mendota, Illinois.

10 Q And do you recall the time period during
11 which those wastes were disposed?

12 A Approximately some time in 1971 or 1972.

13 Q And do you recall the type of waste
14 disposed?

15 A Some sort of oily sludge from a tank
16 cleaning project.

17 Q Was that a one-time type cleaning?

18 A Yes, this was a one-time cleaning
19 project, and it was sort of a bad job and a bad
20 deal, you know, we went broke on this job. And I
21 was out there myself, and Dave Head tried to talk
22 to the purchasing agent or the plant manager into
23 kind of giving us a little more money because, you
24 know, we just weren't doing very well but they

1 insisted that we had signed the contract and we
2 must live up to it. So, I remember this company
3 very well.

4 Q Do you recall the volume of waste you
5 took out of that tank cleaning job?

6 A If I remember right, no matter what we
7 did, we took some out in a tanker but, in the end,
8 it got so bad that we had to bring in a hydraulic
9 boom truck and lower drums down into the tank from
10 the top and then men went in there and shoveled
11 the stuff into drums and closed the drums and
12 lifted them out. So, I am going to say, oh, say
13 50 to 70 drums in total.

14 Q In addition to part of the tanker?

15 A Something in a tanker as we started it
16 out, you know.

17 Q Do you know whether Nalco Chemical
18 disposed of any waste at the U.S. Scrap site?

19 A Yes, they did.

20 Q Do you recall whether Nalco Chemical
21 disposed of any waste at the 9th Avenue Dump site?

22 A Yes, they did.

23 Q Do you know the location of the facility
24 that disposed of those wastes?

1 A 621 West 66th Street, Bedford Park,
2 Illinois.

3 Q Do you recall the time period during
4 which those wastes were disposed?

5 A 1972, approximately, to 1974.

6 Q Do you know the type of waste disposed?

7 A Some sort of chemicals. I am not sure
8 what kind of chemicals.

9 Q Do you know the volume of waste disposed
10 at the two sites?

11 A One to two 4,000- to 5,000-gallon tanker
12 each month.

13 Q Do you know whether Namsco disposed of
14 any waste at the U.S. Scrap site?

15 A Yes, they did.

16 Q Do you know whether Namsco disposed of
17 any waste at the 9th Avenue Dump site?

18 A Yes, they did.

19 Q Do you know the location of the facility
20 that disposed of those wastes?

21 A 333 31st Street, Bellwood, Illinois.

22 Q And do you know the time period during
23 which the wastes were disposed?

24 A 1973 until 1975.

1 Q Do you recall the type of waste?

2 A Some type of oil.

3 Q And do you recall the volume of waste
4 disposed during that time period?

5 A 10 to 20 drums. One to two times a year
6 on the pickups.

7 Q Do you know whether Nashua disposed of
8 any waste at the U.S. Scrap site?

9 A Yes, they did.

10 Q Do you know whether Nashua disposed of
11 any waste at the 9th Avenue Dump site?

12 A No, they did not.

13 Q Do you recall the location of the
14 facility that disposed of those wastes?

15 A 7800 South Woodlawn Avenue, Chicago,
16 Illinois.

17 Q Do you recall the time period during
18 which those wastes were disposed?

19 A 1965 until, approximately, 1969.
20 Sometime in there.

21 Q And do you recall the type of waste?

22 A It was solvents -- very volatile
23 solvents, and rubber tapes that were in the
24 drums -- in the solvents.

1 Q Do you recall the volume of waste?

2 A It was 50 to 70 drums per week,
3 approximately. And I was at that site myself a
4 couple of times. And this is -- incidentally,
5 this is a division of Johns Manville Corporation.

6 Q Do you know whether National Can Company
7 disposed of any waste at the U.S. Scrap site?

8 A Yes, they did.

9 Q Do you know whether National Can Company
10 disposed of any waste at the 9th Avenue Dump site?

11 A Yes, they did.

12 Q Do you know the location of the facility
13 that disposed of those wastes?

14 A Well, there were three facilities that we
15 handled; one was at 5620 West 51st Street,
16 Summitt, Illinois; one was at 3217 West 47th
17 Street, Chicago, Illinois and one was in LaPorte,
18 Indiana.

19 Q And do you know the time period during
20 which those facilities disposed of wastes at the
21 two sites?

22 A As best I can remember, all three were
23 from about 1972 until 1975.

24 Q Do you recall the types of waste

1 involved?

2 A Two plants were solvents, paints,
3 varnishes and adhesives for the 51st plant and the
4 47th Street plant and then -- and that was in
5 drums. And then the LaPorte plant was a tanker
6 stop and that was chemicals and solvents,
7 basically.

8 Q And do you recall the volume of waste
9 disposed by the facilities at the two sites?

10 A On the 51st Street plant about 30 to 50
11 drums per month. On the 47th Street plant about
12 15 to 20 drums a month and on the -- okay. On the
13 LaPorte, Indiana facility we picked up about one
14 to two tanker loads a week, and the tanker held
15 between 4,000 and 5,000 gallons.

16 Q Do you know whether National Precision
17 Circuit disposed of any waste at the U.S. Scrap
18 site?

19 A Yes, they did.

20 Q Do you know whether National Precision
21 Circuit disposed of any waste at the 9th Avenue
22 Dump site?

23 A Yes, they did.

24 Q Do you recall the location of the

1 facility that disposed of those wastes?

2 A 2925 Lucy Lane, Franklin Park, Illinois.

3 Q And do you recall the time period during
4 which those wastes were disposed?

5 A 1973 until 1975.

6 Q Do you recall the type of waste disposed?

7 A Some type of acid.

8 Q Do you recall the volume of waste?

9 A 4,000 to 5,000 gallons in a tanker per
10 month. That's one load a month.

11 Q Do you recall whether National Steel
12 Container disposed of waste at the U.S. Scrap
13 site?

14 A I believe they did.

15 Q Do you know whether National Steel
16 Container disposed of any waste at the 9th Avenue
17 Dump site?

18 A I don't think so.

19 Q Do you know the location of the facility
20 that disposed of waste at the U.S. Scrap site?

21 A 6700 South LeClaire Avenue, Bedford Park,
22 Illinois.

23 Q Do you recall the time period during
24 which it disposed of those wastes?

1 A As best I can remember, it would be some
2 time between 1967 and 1972.

3 Q And do you recall the type of waste?

4 A It would be ink, paint, and solvents in
5 steel drums.

6 Q And do you recall the volume of waste
7 disposed during that time period?

8 A As best as I can remember and in talking
9 to the driver, we picked up two to three loads.
10 And these were like trial loads, and we were
11 trying real hard to get this stop because the
12 drums were brand new. This was a drum
13 manufacturing company and whatever drums you got
14 were brand new because they would just take their
15 test drums and give them to you. And they were
16 real nice drums to resell again.

17 Incidentally, on that -- another
18 thing I remember is is a man by the name of
19 Charlie Debs was instrumental in helping us trying
20 to arrange to get us that stop. He seemed to have
21 an in, and he was a scrap dealer. That was
22 D-e-b-s.

23 Q He seemed to know someone at National
24 Steel?

1 A I believe he knew either the purchaseing
2 agent or the plant manager. One of those two men
3 down there.

4 Q Do you know whether National Wrecking
5 Company disposed of waste at the U.S. Scrap site?

6 A Yes, they did.

7 Q Do you know whether National Wrecking
8 Company disposed of any waste at the 9th Avenue
9 Dump site?

10 A No, they didn't.

11 Q Do you recall the location of the
12 facility that disposed of those wastes?

13 A Various demolition jobs throughout the
14 city and suburbs of Chicago.

15 Q Do you recall the time period during
16 which they disposed of waste?

17 A Approximately 1973 and 1974.

18 Q And do you recall the type of waste
19 disposed?

20 A Concrete, wood, bricks, roofing material,
21 all -- whatever is involved in wrecking the
22 building.

23 Q Do you recall any liquid waste?

24 A No, I don't believe I do.

1 Q Do you recall the volume of waste
2 disposed?

3 A In the time period that they were
4 dumping, it was almost on an every-day basis.

5 Q Do you recall whether the U.S. Government
6 ever disposed of any waste at the U.S. Scrap from
7 its Nike Silo sites?

8 A Yes, they did.

9 Q Do you recall whether they disposed of
10 any waste at the 9th Avenue dump?

11 A No, they didn't.

12 Q Do you recall the location of the
13 facility that disposed of the waste at the U.S.
14 Scrap site?

15 A I believe the one was Belmont Avenue,
16 Nike site, and then the other one was, I think --
17 you know, I did some more thinking, and I believe
18 the other one was Jackson Park. There were two
19 sites.

20 Q Do you recall the time period during
21 which they disposed of that waste?

22 A Somewhere around 1970 or '71.

23 Q Do you recall the type of waste?

24 A Some type of oil. I was there on those

1 sites. I was in both of those sites with the
2 truck because we had a little police escort that
3 allowed us to go down Lake Shore Drive, which is
4 illegal for a truck to drive on there.

5 Q Was that a one-time deal at both sites?

6 A Yes, sir, it was one time.

7 Q Do you recall the volume of waste?

8 A I am going to estimate 2 to 3,000 gallons
9 of oil.

10 Q Do you know whether Outboard Marine
11 Corporation ever disposed of any waste at the U.S.
12 Scrap site?

13 A I believe they did.

14 Q Do you recall whether Outboard Marine
15 ever disposed of any waste at the 9th Avenue Dump
16 site?

17 A I don't think so.

18 Q Do you know the location of the facility
19 that disposed of those wastes?

20 A Some place in Waukegan, Illinois.

21 Q And do you recall the time period during
22 which they disposed of those wastes?

23 A Approximately 1969 or 1970.

24 Q Do you recall the type of waste?

1 A I believe it was dirty gasoline or used
2 gasoline from Outboard Motors.

3 Q Do you recall the volume of waste
4 disposed?

5 A I am not sure at this time.

6 Q Do you know whether PPG Industries
7 disposed of any waste at the U.S. Scrap site?

8 A Yes, they did.

9 Q Do you know whether PPG Industries
10 disposed of any waste at the 9th Avenue Dump site?

11 A Yes, they did.

12 Q Do you recall the location of the
13 facility that disposed of those wastes?

14 A I believe it was originally -- the plant
15 was originally in Milwaukee, Wisconsin, and then
16 later it moved to Oak Creek, Wisconsin, which is
17 kind of like a southern suburb.

18 Q Do you recall the time period during
19 which it disposed of those wastes?

20 A 1969 until 1975.

21 Q Do you recall the type of waste?

22 A Paints, solvents and coatings.

23 Q Do you recall the volume of wastes
24 disposed at the two sites?

1 A In my original statement I said, "Three
2 to four trailer loads a month," I would like to
3 say now that -- and, again, that all factories do
4 not have a, you know, an even pattern of time. I
5 would like to change that to one to four trailer
6 loads a month to allow for the, you know, ups and
7 downs and then a 4,000-gallon tanker load four to
8 six times a year.

9 Q Do you know whether Penn-Dixie Steel
10 Company disposed of waste at the U.S. Scrap site?

11 A I am not sure.

12 Q Do you know whether Penn-Dixie Steel
13 disposed of waste in the 9th Avenue Dump site?

14 A Yes, they did.

15 Q Do you know the location of the facility
16 that disposed of those wastes?

17 A 2842 West Vermont Street, Blue Island,
18 Illinois. And Penn-Dixie Steel is -- let's see,
19 Blue Island Sign and Specialty Wire Division.
20 That seems to be the whole name.

21 Q Do you recall the time period during
22 which Penn-Dixie disposed of those wastes?

23 A Approximately 1974, 1975.

24 Q And do you recall the type of waste?

1 A I am not sure at this time.

2 Q Do you recall the volume of waste
3 disposed?

4 A I am not sure, but I think it was in
5 drums.

6 Q Do you recall whether Pierce-Stevens
7 Chemical Company disposed of any waste at the U.S.
8 Scrap site?

9 A Yes, they did.

10 Q Do you recall whether Pierce-Stevens
11 Chemical Company disposed of any waste at the 9th
12 Avenue Dump site?

13 A Yes, they did.

14 Q Do you recall the location of the
15 facility that disposed of those wastes?

16 A 245 East Kehoe Street, Carol Stream,
17 Illinois.

18 Q Do you recall the time period during
19 which those wastes were disposed?

20 A 1972 until 1975.

21 Q Do you recall the type of waste involved?

22 A Solvents, paints, lacquers and coatings.

23 Q Do you recall the volume of waste
24 disposed?

1 A Approximately 50 to 70 drums per month.

2 Q Do you recall whether Pittsburgh Metals
3 disposed of any waste at the U.S. Scrap site?

4 A I am not sure.

5 Q Do you recall whether Pittsburgh Metals
6 disposed of any waste at the 9th Avenue Dump site?

7 A Yes, they did.

8 Q Do you recall the location of the
9 facility from which those wastes were disposed?

10 A Not at this time.

11 Q Do you recall the time period during
12 which the wastes were disposed?

13 A 1974 until 1975.

14 Q Do you recall the type of waste?

15 A I am not sure.

16 Q And do you recall the volume of waste
17 disposed?

18 A Not at this time.

19 Q Do you know whether Precision Twist Drill
20 Company disposed of any waste at the U.S. Scrap
21 site?

22 A Yes, they did.

23 Q Do you know whether Precision Twist Drill
24 Company disposed of any waste at the 9th Avenue

*Precision
Twist*

1 Dump site?

2 A Yes, they did.

3 Q Do you recall the location of the
4 facility that disposed of those wastes?

5 A 301 Industrial Avenue, Crystal Lake,
6 Illinois.

7 Q Do you recall the time period during
8 which those wastes were disposed?

9 A Approximately 1973 until 1975.

10 Q Do you recall the type of waste involved?

11 A Oils, solvents and acid.

12 Q And do you recall the volume of waste
13 disposed?

14 A Approximately one to two 3,000-gallon
15 tanker loads per month.

16 Q Do you know whether Prefinished Metals
17 disposed of any waste at the U.S. Scrap site?

18 A Yes, they did.

19 Q Do you know whether Prefinished Metals
20 disposed of any waste at the 9th Avenue Dump site?

21 A Yes, they did.

22 Q Do you recall the location of the
23 facility from which those wastes were disposed?

24 A 2300 East Pratt Boulevard, Elk Grove

1 Village, Illinois.

2 Q Do you recall the time period during
3 which those wastes were disposed?

4 A Approximately 1973 until 1975.

5 Q Do you recall the type of waste disposed?

6 A Paints and solvents.

7 Q Do you recall the volume of waste
8 disposed?

9 A Approximately 50 to 70 drums every two or
10 three months.

11 Q Do you recall whether Premier Paints
12 disposed of any waste at the U.S. Scrap site?

13 A Yes, they did.

14 Q Do you recall whether Premier Paints
15 disposed of any waste at the 9th Avenue Dump site?

16 A Yes, they did.

17 Q Do you recall the location of the
18 facility from which those wastes were disposed?

19 A 2250 Arthur Avenue, Elk Grove Village,
20 Illinois.

21 Q Do you recall the time period during
22 which those wastes were disposed?

23 A 1972 until 1975.

24 Q Do you recall the type of waste disposed?

1 A Paints and varnishes and solvents.

2 Q Do you recall the volume of waste?

3 A Two to three trailer loads of drums a
4 year.

5 Q Do you recall whether Proler-Chicago
6 disposed of any waste at the U.S. Scrap site?

7 A Yes, they did.

8 Q Do you know whether Proler-Chicago
9 disposed of any waste at the 9th Avenue Dump site?

10 A No, they did not.

11 Q Do you recall the location of the
12 facility that disposed of those wastes?

13 A 36th and California Avenue, Chicago,
14 Illinois.

15 Q Do you recall the time period during
16 which it disposed of those wastes?

17 A 1965 until 1968.

18 Q Do you recall the type of waste involved?

19 A Automobile seat cushions. And,
20 incidentally, I did some more thinking, and I
21 believe we hauled some automobile gasoline tanks
22 out with the -- now, I think the gas was taken out
23 of them, but, again, I think we hauled some loads
24 of gas tanks out of there.

1 Q Do you recall the volume of waste
2 disposed?

3 A Every-day basis.

4 Q How would that be hauled? Would that be
5 hauled on a flatbed or something?

6 A In a rolloff container like a 40-yard
7 container box we called it. It rolls off the
8 truck and sits on the ground.

9 Q Do you recall any liquid waste from
10 Trailer Chicago?

11 A No, not as such. If there was any liquid
12 waste at all, it would have to be in those
13 gasoline tanks.

14 Q Do you recall whether R.A. Briggs
15 disposed of any waste at the U.S. Scrap site?

16 A Yes, they did.

17 Q Do you remember whether R.A. Briggs
18 disposed of any waste at the 9th Avenue Dump site?

19 A Yes, they did.

20 Q Do you recall the location of the
21 facility which disposed of those wastes?

22 A 650 North Church Street, Lake Zurich,
23 Illinois.

24 Q Do you recall the time period during

1 which those wastes were disposed?

2 A 1973 until 1975.

3 Q Do you recall the types of waste
4 disposed?

5 A I think it's some sort of solvents.

6 Q Do you recall the volume of waste
7 disposed at the two sites?

8 A Approximately 1,500 gallons in a tanker
9 two times a month.

10 Q Do you recall whether R-Lite Chemical
11 Coatings disposed of any waste at the U.S. Scrap
12 site?

13 A Yes, they did.

14 Q Do you recall whether R-Lite Chemical
15 Coatings disposed of any waste at the 9th Avenue
16 Dump site?

17 Q Yes, they did.

18 Q Do you recall the location of the
19 facility which disposed of those wastes?

20 A 411 South Union Street, Geneva, Illinois.

21 Q Do you recall the time period during
22 which those wastes were disposed?

23 A Some time in 1973 until 1975.

24 Q Do you recall the type of waste disposed?

1 A Paints and solvents.

2 Q Do you recall the volume of waste
3 disposed during that time period?

4 A I am not sure at this time.

5 Q Do you know whether R.R. Donnelley and
6 Sons disposed of any waste at the U.S. Scrap site?

7 A Yes, they did.

8 Q Do you recall whether R.R. Donnelley and
9 Sons disposed of any waste at the 9th Avenue Dump
10 site?

11 A Yes, they did.

12 Q Do you recall the location of the
13 facility which disposed of those wastes?

14 A Mattoon, Illinois.

15 Q Do you recall the time period during
16 which those wastes were disposed?

17 A Around 1973 until 1975.

18 Q Do you recall the type of waste disposed?

19 A Solvents and inks.

20 Q Do you recall the volume of waste
21 disposed during that time period?

22 A Approximately one to two trailer loads
23 per month.

24 Q Do you recall whether Rauland Tube

1 Company disposed of any waste at the U.S. Scrap
2 site?

3 A Yes, they did.

4 Q Do you recall whether Rauland Tube
5 Company disposed of any waste at the 9th Avenue
6 Dump site?

7 A Yes, they did.

8 Q Do you recall the location of the
9 facility which disposed of those wastes?

10 A 25th Avenue and North Avenue in Melrose
11 Park, Illinois.

12 Q Do you recall the time period during
13 which those wastes were disposed?

14 A 1972 until 1975.

15 Q Do you recall the type of waste disposed?

16 A Acid, solvents, paints and oils.

17 Q And do you recall the volume of waste
18 disposed during that time period?

19 A On my original statement I said, "Three
20 to four semi-trailers per month," and, again,
21 remembering that no factory turns us out on an
22 even basis, I would like to make it, again, one to
23 four trailer loads a month. It could have been as
24 high as four and it could be sometimes, some

1 months, lower, you know. And this is Zenith --
2 incidentally, a division of Zenith.

3 Q Okay. Do you recall whether Reflector
4 Hardware disposed of any waste at the U.S. Scrap
5 site?

6 A Yes, they did.

7 Q Do you recall whether Reflector Hardware
8 disposed of any waste at the 9th Avenue Dump site?

9 A Yes, they did.

10 Q Do you recall the location of the
11 facility which disposed of those wastes?

12 A 1400 North 25th Avenue, Melrose Park,
13 Illinois.

14 Q Do you recall the time period during
15 which those wastes were disposed?

16 A 1973 until 1975.

17 Q Do you recall the type of waste disposed?

18 A Paints, varnishes, solvents and oils.

19 Q Do you recall the volume of waste
20 disposed during that time period?

21 A One to two semi-trailer loads of drums
22 per month.

23 Q Do you recall whether Regal Tube disposed
24 of any waste at the U.S. Scrap site?

1 A Yes, they did.

2 Q Do you recall whether Regal Tube disposed
3 of any waste at the 9th Avenue Dump site?

4 A Yes, they did.

5 Q Do you recall the location of the
6 facility which disposed of those wastes?

7 A 7401 South Linder Avenue, and that would
8 be Bedford Park, Illinois.

9 Q Do you recall the time period during
10 which those wastes were disposed?

11 A Approximately 1973 until 1975.

12 Q Do you recall the type of waste disposed?

13 A I believe it was acid and oil.

14 Q And do you recall the volume of waste
15 disposed during that time period?

16 A On my original statement I said, "Five to
17 six 4,500 to 5,000 tanker loads a week," and,
18 again, so it doesn't effect -- the factory doesn't
19 operate exactly even. I would like to make that,
20 like, three to six 4,500-gallon to 5,000-gallon
21 tanker loads a week. That's after reviewing the
22 records a little more.

23 MR. KOWALSKI: Let's take a two-minute break.

24 (Whereupon, a short break was had

1 after which the preceding
2 deposition

3 continued as follows:)

4

5 BY MR. KOWALSKI:

6 Q Mr. Martell, do you recall whether
7 Reichold ever disposed of any waste at the U.S.
8 Scrap site?

9 A Not at this time.

10 Q Do you recall whether Reichold ever
11 disposed of any waste at the 9th Avenue Dump site?

12 A Not at this time.

13 Q Do you recall whether Reliance Electric
14 ever disposed of any waste at the U.S. Scrap site?

15 A I don't remember at this time.

16 Q Do you recall whether Reliance Electric
17 ever disposed of any waste at the 9th Avenue Dump
18 site?

19 A No, I can't remember at this time.

20 Q Do you know whether Remington Arms
21 Company ever disposed of any waste at the U.S.
22 Scrap site?

23 A Not at this time.

24 Q Do you recall whether Remington Arms

1 Company ever disposed of any waste at the 9th
2 Avenue Dump site?

3 A Not at this time.

4 Q Do you recall whether Republic Steel
5 Corporation ever disposed of any waste at the U.S.
6 Scrap site?

7 A Yes, they did.

8 Q Do you recall whether Republic Steel
9 Corporation ever disposed of any waste at the 9th
10 Avenue Dump site?

11 A In my original statement I says, "No,
12 they didn't," but on further reviewing my little
13 notes and that, I have changed my answer to yes.

14 Q And why is that?

15 A Because I found evidence of their name in
16 some of the notes in later years, towards 1975.

17 Q Do you recall the location of the
18 facility from which Republic Steel disposed of
19 those wastes?

20 A 11600 South Burley Avenue, Chicago,
21 Illinois.

22 Q Do you recall the time period during
23 which those wastes were disposed?

24 A Approximately 1969 or 1970 until 1975.

1 Q Do you recall the type of waste disposed?

2 A Acid and some sort of tar.

3 Q Do you recall the volume of waste
4 disposed at the two sites?

5 A Approximately one to two 5,000-gallon
6 tanker load a week.

7 Q Do you recall whether Resins, Solvents
8 and Varnishes Company ever disposed of any waste
9 at the U.S. Scrap site?

10 A Yes, they did.

11 Q Do you recall whether Resins, Solvents
12 and Varnishes Company ever disposed of any waste
13 at the 9th Avenue Dump site?

14 A No, they didn't.

15 Q Do you recall the location of the
16 facility which disposed of those wastes?

17 A It was in Chicago Heights, Illinois.

18 Q Do you recall the time period during
19 which the wastes were disposed?

20 A 1965 until 1967.

21 Q Do you recall the type of waste disposed?

22 A Solvents, inks, varnishes and resins.

23 Q Do you recall the volume of waste
24 disposed during that time period?

1 A Approximately 30 to 50 drums a month.

2 Q Do you recall whether Revere Brass ever
3 disposed of any waste at the U.S. Scrap site?

4 A Not at this time.

5 Q Do you recall whether Revere Brass ever
6 disposed of any waste at the 9th Avenue Dump site?

7 A Not at this time.

8 Q Do you recall whether Rex Chain ever
9 disposed of any waste at the U.S. Scrap site?

10 A Yes, they did.

11 Q Do you recall whether Rex Chain ever
12 disposed of any waste at the 9th Avenue Dump site?

13 A Yes, they did.

14 Q Do you recall the location of the
15 facility which disposed of those wastes?

16 A 13943 Park Avenue, Dolton, Illinois.

17 Q Do you recall the time period during
18 which those wastes were disposed?

19 A 1971 until 1975.

20 Q Do you recall the type of waste disposed?

21 A Some type of oil.

22 Q Do you recall the volume of waste
23 disposed during that time period?

24 A Approximately 3,000 to 5,000 gallons in a

1 tarker each week. And I was at this factory where
2 we watched where a truck would pack up and put the
3 hoses in because they were a little concerned
4 about the truck messing up their property. But I
5 had been at this facility and walked with the
6 plant manager through it and, you know, they
7 showed us where -- what they wanted done and what
8 they didn't want done over there. This is also
9 known today as Rexnord Corporation.

10 Q Do you know if it was known as Rexnord at
11 the time you hauled for them?

12 A Both names. In the beginning as Rex
13 Chain Belt and later on it was Rexnord.

14 Q Do you recall whether Rexene Polymers
15 disposed of any waste at the U.S. Scrap site?

16 A Yes, they did.

17 Q Do you recall whether Rexene Polymers
18 disposed of any waste at the 9th Avenue Dump site?

19 A Yes, they did.

20 Q Do you recall the location of the
21 facility which disposed of those wastes?

22 A Well, it's -- I think originally it was,
23 like, called Joliet, Illinois, and it may have
24 been changed to a new town called Elwood,

1 Illinois. And that's on I-55 by Arsenal Road.

2 Q Do you recall the time period during
3 which Rexene disposed of those wastes?

4 A Backing up to that address again it's --
5 that maybe the exit, but I guess it's really
6 Interstate 55 and to Des Plaines River. They are
7 right adjacent to the river. And also it's a
8 division of Dart Industries.

9 On my original statement I said,
10 "1969 to 1975," I believe it would be closer to
11 1970 to 1975 because it was a vacuum tanker stop.

12 Q And do you recall the type of waste
13 disposed?

14 A Some type of polystyrene polymer.

15 Q Do you recall the volume of waste
16 disposed between 1970 and 1975?

17 A One to two tanker loads a day including
18 weekends and the tanker would hold 4,000 to 5,000
19 gallons.

20 Q Do you recall the names of any people you
21 dealt with at Rexene?

22 A Yeah, I believe there was a man there
23 called Mr. Chestnut.

24 Q Do you recall what his job position was?

1 A It was probably, like, plant manager. I
2 had been out there, too -- out to Rexene, myself
3 because we had some -- you know, in a volume like
4 that, there had to be breakdowns and problems, and
5 these drivers create problems all the time, too.

6 Q When you say, "so many loads a day,"
7 would that be 365 days a year?

8 A In this case, yes. This one and maybe
9 one or two others would be the only ones that fall
10 into that class. But Rexene -- it would not be
11 unusual for Rexene to have 20 loads waiting for
12 you, 20 or 30 trailer loads of drums -- tanker
13 loads, I'm sorry.

14 Q Okay. So, except when you specify that
15 it would be seven days a week, would it be five
16 days? Would you be assuming a five-day work week?

17 A Yes. Oh, yes.

18 Q And when you say, "so many loads per
19 week," is that assuming 52 weeks per year?

20 A Well, in most cases, you know, there
21 might be some place where they will shut down or
22 they just don't have you come in. But this and,
23 say, Mobil and Clark Oil, these were refineries
24 and they never shut down Christmas, Thanksgiving,

1 it's 24 hours a day, seven days a week. They just
2 go all the time, and the waste is generated all
3 the time. So, just a handful. What we are doing
4 is, like, say some of the other big accounts like
5 Regal they ran a lot, too, but you wouldn't have
6 this kind of action that, you know, Rexene had.

7 Q If as we go through the deposition,
8 Mr. Martell, you recall specifically any companies
9 that had any specific shut-down periods during the
10 year or anything of that nature or on a cyclical
11 basis, would you please tell me?

12 A I will.

13 Q Okay. Do you recall whether Richardson
14 Graphics disposed of any waste at the U.S. Scrap
15 site?

16 A Yes, they did.

17 Q Do you recall whether Richardson Graphics
18 disposed of any waste at the 9th Avenue Dump site?

19 A Yes, they did.

20 Q Do you recall the location of the
21 facility which disposed of those wastes?

22 A 9797 West 151st Street, Orland Park,
23 Illinois.

24 Q Do you recall the time period during

1 Q Do you recall the time period during
2 which those wastes were disposed?

3 A Approximately 1972 until 1975.

4 Q Do you recall the type of waste disposed?

5 A Paints, varnishes and solvents.

6 Q Do you recall the volume of waste
7 disposed between 1972 and 1975?

8 A Normally it would be like three to four
9 trailer loads of drums a month, but when we
10 started out, they had an accumulation of many
11 drums and then I think they had another
12 accumulation later on. And where we might go
13 there twice in one day for a few days running
14 until we brought the accumulation down because
15 probably the fire department was bothering them.
16 And I was at that factory, too, with the tractor
17 and trailer picking up.

18 Q Do you recall whether Scholle Chemical
19 ever disposed of any waste at the U.S. Scrap site?

20 A Yes, they did.

21 Q Do you recall whether Scholle Chemical
22 ever disposed of any waste at the 9th Avenue Dump
23 site?

24 A Yes, they did.

1 Q Do you recall the location of the
2 facility which disposed of those wastes?

3 A 200 West North Avenue, Northlake,
4 Illinois.

5 Q Do you recall the time period during
6 which it disposed of those wastes?

7 A Approximately 1972 until 1975.

8 Q Do you recall the type of waste disposed?

9 A I believe it's solvents and coatings.

10 Q Do you recall the volume of waste
11 disposed during that time period?

12 A Two to three trailer loads of drums
13 during a year.

14 Q Do you recall whether Scott Incorporated
15 disposed of any waste at the U.S. Scrap site?

16 A Not at this time.

17 Q Do you recall whether Scott Incorporated
18 disposed of any waste at the 9th Avenue Dump site?

19 A Not at this time.

20 Q Do you recall whether Shakeproof disposed
21 of any waste at the U.S. Scrap site?

22 A I'm not sure.

23 Q Do you recall whether Shakeproof disposed
24 of any waste at the 9th Avenue Dump site?

1 A Yes, they did.

2 Q Do you recall the location of the
3 facility which disposed of those wastes?

4 A Yes, I do. And it's -- incidentally,
5 this is Illinois Tool Works, Incorporated,
6 Shakeproof Division. It's the way it's called.
7 And it's at St. Charles Road, Elgin, Illinois.

8 Q Do you recall the time period during
9 which those wastes were disposed?

10 A In my original statement I said, "1974,"
11 and upon continually looking at the notes, I would
12 like to put down 1973 to 1975.

13 Q Do you recall the type of wastes
14 disposed?

15 A Some type of oil I believe it was.

16 Q And do you recall the volume of waste
17 disposed during that time period?

18 A Not at this time.

19 Q Do you recall whether Signode disposed of
20 any waste at the U.S. Scrap site?

21 A Yes, they did.

22 Q Do you recall whether Signode disposed of
23 any waste at the 9th Avenue Dump site?

24 A Yes, they did.

1 Q Do you recall the location of the
2 facility which disposed of those wastes?

3 A 7701 West 71st Street, Bridgeview,
4 Illinois.

5 Q Do you recall the time period during
6 which those wastes were disposed?

7 A Approximately 1970 to 1973.

8 Q Do you recall the type of waste disposed?

9 A Some type of acid.

10 Q Do you recall the volume of waste
11 disposed during that time period?

12 A Three to four tanker loads a month and a
13 tanker would hold somewhere between 4,000 to 5,000
14 gallons in each load.

15 Q Do you recall whether Sigoli Metal
16 Plating disposed of any waste at the U.S. Scrap
17 site?

18 A Yes, they did.

19 Q Do you recall whether Sigoli Metal
20 Plating disposed of any waste at the 9th Avenue
21 Dump site?

22 A No, I don't think they did.

23 Q Do you recall the location of the
24 facility which disposed of those wastes?

1 A 2849 West Lake Street, Chicago, Illinois.

2 Q Do you recall the time period during
3 which those wastes were disposed?

4 A Approximately 1969, 1970.

5 Q Do you recall the type of wastes
6 disposed?

7 A Some type of acid.

8 Q Do you recall the volume of wastes
9 disposed during that time period?

10 A I am not sure at this time.

11 Q Do you recall whether Sinclair and
12 Valentine disposed of any waste at the U.S. Scrap
13 site?

14 A Yes, they did.

15 Q Do you recall whether Sinclair and
16 Valentine disposed of any waste at the 9th Avenue
17 Dump site?

18 A I am not sure about that at this time.

19 Q Do you recall the location of the
20 facility which disposed of waste at the U.S. Scrap
21 site?

22 A 4101 South Pulaski Road, Chicago,
23 Illinois.

24 Q Do you recall the time period during

1 which those wastes were disposed?

2 A Approximately 1965 until 1972.

3 Q Do you recall the type of waste disposed?

4 A Inks, resins and varnishes and drums.

5 Q Do you recall the volume of waste

6 disposed during that time period?

7 A 40 to 50 drums a month. And I drove the

8 truck and backed it into the dock and loaded the

9 drums myself at this particular stop.

10 Q Do you recall whether Size Control

11 disposed of any waste at the U.S. Scrap site?

12 A Yes, they did.

13 Q Do you recall whether Size Control

14 disposed of any waste at the 9th Avenue Dump site?

15 A Yes, they did.

16 Q Do you recall the location of the

17 facility which disposed of those wastes?

18 A 299 Bond Street, Elk Grove Village,

19 Illinois.

20 Q Do you recall the time period during

21 which those wastes were disposed?

22 A 1973 until 1975.

23 Q Do you recall the type of waste disposed?

24 A Some sort of solvents and chemicals.

1 Q Do you recall the volume of the waste
2 disposed during that time period?

3 A Approximately 20 to 40 drums in a load,
4 and the load there would be about three or four
5 loads a year.

6 Q Did you utilize a special trailer that
7 would pick up smaller loads like that, or would
8 that just be a partial filling of a trailer?

9 A Well, once in while we would use, like, a
10 truck or something if we were just too far behind.
11 But normally in the smaller loads, a bunch of
12 stops would make one big load. They would go
13 until they got 80 or if there was some light ones,
14 you know, drums that were half full or so, they
15 would lift them up and put them on top and they
16 might even bring in 100 drums on one trailer load.

17 Q All right. Do you recall whether Skil
18 Power Tool would dispose of any waste at the U.S.
19 Scrap site?

20 A Yes, they did.

21 Q Do you recall whether Skil Power Tool
22 disposed of any waste at the 9th Avenue Dump site?

23 A Yes, they did.

24 Q Do you recall the location of the

1 facility which disposed of those wastes?

2 A Okay. In my original statement I said,
3 "1444 Wolf Road, Wheeling, Illinois," in talking
4 to a driver, we also believe there was pickups at
5 5033 Elston Avenue in Chicago.

6 Q And who is the driver you spoke to?

7 A LeRoy Brown.

8 Q Do you recall the time period during
9 which waste would be disposed of?

10 A 1972 until 1975.

11 Q Do you recall the type of waste disposed?

12 A Paints and solvents.

13 Q And do you recall the volume disposed of
14 over that time period?

15 A To the best I could figure out, about 40
16 to 60 drums, three to four times a year.

17 Q Do you recall whether Sommer and Maca
18 disposed of any waste at the U.S. Scrap site?

19 A Yes, they did.

20 Q Do you recall whether Sommer and Maca
21 disposed of any waste at the 9th Avenue Dump site?

22 A Yes, they did.

23 Q Do you recall the location of the
24 facility which disposed of those wastes?

1 A 5501 West Ogden Avenue, Chicago,
2 Illinois.

3 Q Do you recall the time period during
4 which those wastes were disposed?

5 A 1969 until 1975.

6 Q Do you recall what type of waste was
7 disposed?

8 A Oils and solvents and paints.

9 Q Do you recall the volume of waste
10 disposed during that time period?

11 A About 25 to 40 drums picked up two to
12 three times a year.

13 Q Do you recall whether Specialty Coatings
14 disposed of any waste at the U.S. Scrap site?

15 A Yes, they did.

16 Q Do you recall whether Specialty Coatings
17 disposed of any waste at the 9th Avenue Dump site?

18 A Yes, they did.

19 Q Do you recall the location of the
20 facility which disposed of those wastes?

21 A 2500 Delta Lane, Elk Grove Village,
22 Illinois.

23 Q Do you recall the type of waste disposed?

24 A The type of waste?

1 Q Yes.

2 A Paints, solvents, coatings and finishes.

3 Q Do you recall the volume of waste
4 disposed?

5 A They had a semi-trailer load of drums
6 three to four times year.

7 MS. TIGHE: Off the record.

8 (Discussion held off the record.)

9

10 BY MR. KOWALSKI:

11 Q Mr. Martell, do you recall the time
12 period during which those wastes were disposed at
13 the two sites?

14 A Yeah, approximately 1972 until 1975.

15 Q Do you recall whether Specified Plating
16 disposed of any waste at the U.S. Scrap site?

17 A I don't remember at this time.

18 Q Do you recall whether Specified Plating
19 disposed of any waste at the 9th Avenue Dump site?

20 A Yes, they did.

21 Q Do you recall the location of the
22 facility which disposed of those wastes?

23 A 320 North Harding Avenue, Chicago,
24 Illinois.

1 Q Do you recall the time period during
2 which those wastes were disposed?

3 A Approximately 1974 to 1975.

4 Q Do you recall the type of waste disposed?

5 A Some form of acid.

6 Q And do you recall the volume disposed
7 during that time period?

8 A No, I don't remember the volume, but I
9 believe it was picked up in vacuum tankers.

10 Q Do you recall whether Spot Nails disposed
11 of any waste at the U.S. Scrap site?

12 A Yes, they did.

13 Q Do you recall whether Spot Nails disposed
14 of any waste at the 9th Avenue Dump site?

15 A Yes, they did.

16 Q Do you recall the location of the
17 facility which disposed of those wastes?

18 A 1100 Hicks Road, Rolling Meadows,
19 Illinois.

20 Q Do you recall the time period during
21 which those wastes were disposed?

22 A 1973 until 1975.

23 Q Do you recall the type of waste disposed?

24 A Some sort of oil wash solution.

1 Q And do you recall the volume of waste
2 disposed during that time period?

3 A They had one to two tanker loads of waste
4 a month, and a tanker would hold 4,000 to 5,000
5 gallons in each load. And I was at this factory,
6 not as a driver, but I was there observing what
7 the driver was doing and where he backed the
8 trailer in and all of that.

9 Q Is there any reason you were observing?

10 A I don't remember. I just remember being
11 there. I don't know why I was there. If there
12 was a problem or not. It might be like, you know,
13 again, to make sure we got into the right place
14 and didn't cause any problems to their facility.

15 Q As a driver, do you recall any particular
16 stops that were difficult to maneuver the truck
17 into to make the pickup?

18 A Oh, a lot of them. In fact, you know, a
19 good percentage of them.

20 Q Do any stand out in your mind?

21 A Well, again, like I told you about Star
22 Trucking, you know, you couldn't go during the
23 daytime because it was surrounded by automobiles,
24 and you had to do it at nighttime. We had a lot

1 of stops where it was very difficult. Sinclair
2 and Valentine wasn't the greatest place to get
3 into. There was many of them and, you know, you
4 have to watch because people they park the cars in
5 the way. You have to tell the shipping boss over
6 there to get somebody to move his automobile out
7 so you can back up. It was a constant problem.

8 Q Do you recall whether Standard T Chemical
9 ever disposed of any waste at the U.S. Scrap site?

10 A Yes, they did.

11 Q Do you recall whether Standard T Chemical
12 disposed of any waste at the 9th Avenue Dump site?

13 A Yes, they did.

14 Q Do you recall the location of the
15 facility which disposed of those wastes?

16 A There were two facilities. One was at
17 26th and Federal Street in Chicago, Illinois; and
18 the second plant was at 10th and Washington in
19 Chicago Heights, Illinois. And incidentally, this
20 is a Montgomery Ward subsidiary.

21 Q Do you recall the time period during
22 which it disposed of waste at those two sites?

23 A 1965 until 1975.

24 Q Do you recall the type of waste disposed?

1 A Paints, solvents, varnishes and coatings.

2 Q And do you recall the volume of waste

3 disposed over that time period?

4 A In my original statement I says, "Three
5 trailer loads between the two plants a month," I
6 would like to say two to three trailer loads total
7 between the two plants per month.

8 Q Again, that's under the assumption that
9 there is some variation in waste?

10 A Right. There are times when there is
11 more and there is times when there is less and
12 there is times when they just don't feel like
13 calling you and, you know, moving it out. Some
14 guy lets it sit there. So, it's never, like, a
15 really even period.

16 Q Do you recall whether Stauffer Chemical
17 disposed of any waste at the U.S. Scrap site?

18 A Yes, they did.

19 Q Do you recall whether Stauffer Chemical
20 disposed of any waste at the 9th Avenue Dump site?

21 A Yes, they did.

22 Q Do you recall the location of the
23 facility from which that waste was disposed?

24 A 11th and Arnold Street, Chicago Heights,

1 Illinois.

2 Q Do you recall the time period during
3 which the waste was disposed?

4 A Approximately 1972 until 1975.

5 Q Do you recall the type of waste disposed?

6 A Some type of chemicals. I am not sure
7 what they were.

8 Q And do you recall the volume disposed
9 during that time period?

10 A Oh, somewhere between one to two trailer
11 loads of drums per month.

12 MS. TIGHE: Off the record.

13 (Discussion held off the record.)

14 BY. MR. KOWALSKI:

15 Q Mr. Martell, do you recall ever going to
16 Stauffer Chemical to pick up a load?

17 A No, I didn't go pick up a load, but I
18 went there as one of the officials from the
19 company to observe something. I forget what it
20 was now, but Dave Head and I both drove out there.
21 Now, there was a fire there or there was some
22 damage -- and it's kind of hazy in my mind, but
23 that has something to do with it. But we were out
24 there with the truck.

1 Q Okay. Do you recall whether Stewart
2 Chemical Paint Company disposed of any waste at
3 the U.S. Scrap site?

4 A Yes, they did.

5 Q Do you recall whether Stewart Chemical
6 Paint Company disposed of any waste at the 9th
7 Avenue Dump site?

8 A No, they didn't.

9 Q Do you recall the location of the
10 facility from which those wastes were disposed?

11 A 118th and Front Street, Chicago,
12 Illinois.

13 Q And do you recall the time period during
14 which the wastes were disposed?

15 A Some time around 1969 or 1970.

16 Q And do you recall the type of waste
17 disposed?

18 A Paints and solvents.

19 Q Do you recall the volume of waste
20 disposed during that time period?

21 A 40 to 50 drums in a trailer load, and I
22 think we picked up two to three loads. And this
23 was right down the street from our office about
24 two blocks, you know, so -- and I was there

1 myself.

2 Q Do you recall whether Stein-Hall disposed
3 of any waste at the U.S. Scrap site?

4 A Yes, they did.

5 Q Do you recall whether Stein-Hall disposed
6 of any waste at the 9th Avenue Dump site?

7 A Yes, they did.

8 Q Do you recall the location of the
9 facility which disposed of those wastes?

10 A 7351 South 78th Avenue, Bridgeview,
11 Illinois. And this is a division of Selanese
12 Corporation.

13 Q Do you recall the time period during
14 which the waste was disposed?

15 A 1972 until 1973.

16 Q Do you recall the type of waste?

17 A Adhesives and chemicals.

18 Q Do you recall the volume of waste
19 disposed?

20 A We picked up drums. Again, I don't know
21 the volume. And then we had a tank cleaning job
22 there inside their plant, and I would say that
23 that was done with a Vac All and that was about 3
24 to 4,000 gallons. And I was there myself on that

1 one because we had a lot of grief with that job.
2 It wasn't going very well at all. And I remember
3 making two or three trips particularly just to try
4 to see if we could somehow get out of this or get
5 the job over with.

6 Q Do you recall anyone you dealt with down
7 there in connection with that?

8 A No, I don't.

9 Q Do you recall the volume of drums that
10 were hauled out of there?

11 A Not at this time.

12 Q Do you recall whether Stressan-Reuter
13 Company disposed of any waste at the U.S. Scrap
14 site?

15 A Yes, they did.

16 Q Do you recall whether Stressan-Reuter
17 Company disposed of waste at the 9th Avenue Dump
18 site?

19 A Not as their name Stressan-Reuter.

20 Q That was under the other name you
21 mentioned earlier?

22 A Right.

23 Q Do you recall the location of the
24 facility which disposed of waste at the U.S. Scrap

1 site?

2 A 400 West Roosevelt Avenue, Bensenville,
3 Illinois.

4 Q And do you recall the time period during
5 which waste was disposed from that facility?

6 A 1965 until 1972.

7 Q Do you recall the type of waste disposed?

8 A Varnishes, oils, resins and some
9 chemicals.

10 Q Do you recall the volume of waste
11 disposed during that time period?

12 A Approximately 3,000 to 5,000 gallons a
13 month taken out in a tanker and then 50 to 60
14 drums a month by van trailer. And I was there
15 myself and, in fact, one of them -- the vacuum
16 tanker ran over and it went into the driveway and
17 I had to clean it up before anybody noticed it
18 there.

19 Q Do you recall whether Stuart Oil Company
20 disposed of any waste at the U.S. Scrap site?

21 A Yes, they did.

22 Q Do you recall whether Stuart Oil Company
23 disposed of any waste at the 9th Avenue Dump site?

24 A Yes, they did.

1 Q Do you recall the location of the
2 facility which disposed of those wastes?

3 A 2727 South Troy Street, Chicago,
4 Illinois.

5 Q Do you recall the time period during
6 which those wastes were disposed?

7 A Approximately '73 or '74.

8 Q Do you recall the type of waste?

9 A Some kind of an oil sludge. And what we
10 did there is we had a tank cleaning job. And I
11 believe there was some kind of urgency there. It
12 was sort of an elevated tank inside a building in
13 a hard to get to place, and we had to string a lot
14 of holes. We kind of ran that job around the
15 clock. And I was there myself a few times. It
16 wasn't that far from our place to run down and
17 check on the boys and see how they were doing.
18 But it was kind of an involved job that we did
19 there.

20 Q Was that just a one-time thing?

21 A Yes, it was.

22 Q Do you recall the volume of waste in
23 connection with that job?

24 A I am going to say 2,000 to 4,000 gallons.

1 Q Do you recall whether Sun Chemical
2 disposed of any waste at the U.S. Scrap site?

3 A Yes, they did.

4 Q Do you recall whether Sun Chemical
5 disposed of any waste at the 9th Avenue Dump site?

6 A Yes, they did.

7 Q Do you recall the location of the
8 facility which disposed of those wastes?

9 A There were two plants. Then there was
10 one in Kankakee -- but anyway, the two plants that
11 really stand out in my mind are the Northlake
12 plant which is 135 West Lake Street and the
13 Bedford Park plant or clearing plant which is 6600
14 South Melvina Avenue in Bedford Park, Illinois.
15 And their other name is General Printing Ink
16 Division.

17 Q And you said there is also a plant in
18 Kankakee?

19 A There was a plant in Kankakee, but I
20 don't remember at this time if we picked up
21 anything for sure there.

22 Q Do you recall the time period during
23 which waste was disposed from those facilities at
24 the two sites?

1 A In both instances it's 1965 to 1975.

2 Q And do you recall the type of waste
3 disposed?

4 A And it's the same in both cases, and it's
5 inks, solvents and resins.

6 Q And do you recall the volume of waste
7 disposed over that time period?

8 A Okay. North Lincoln is one to three
9 trailer loads of drums a month and so is the
10 clearing plant, one to three trailer loads of
11 drums a month. And I was at both plants myself.
12 I loaded the drums at the Melvina plant and I
13 loaded the drums at the Lake Street plant. In
14 fact, there were, you know, quite a few times I
15 was there.

16 Q Mr. Martell, I believe you mentioned
17 earlier in your deposition that a company called
18 Technical Coatings, which was located near the
19 Benjamin Moore facility, was also a customer of
20 U.S. Scrap Corporation?

21 A Yes, they were.

22 Q And did it dispose of waste at the U.S.
23 Scrap site?

24 A Yes, they did.

1 Q Do you recall whether they disposed of
2 waste at the 9th Avenue Dump site?

3 A Yes, they did.

4 Q Do you recall the location of that
5 facility?

6 A North Avenue and 25th Avenue in Melrose
7 Park, Illinois.

8 Q And do you recall the time period during
9 which it disposed of waste at the two sites?

10 A Approximately 1969 or 1970 until 1975.

11 Q Do you recall the type of waste disposed
12 at the two sites?

13 A Some type of solvents.

14 Q And do you recall the volume of waste
15 disposed during that time period?

16 A One 4,000 to 5,000 gallon tanker each
17 month.

18 Q Do you recall whether Terminal Transport
19 disposed of any waste at the U.S. Scrap site?

20 A In my original statement, I says, "I
21 wasn't sure at this time," and the unsure part is
22 the name. But a company with a name almost like
23 this or that name had a facility at 123rd and
24 Stony Island in Chicago and they did dispose of

1 waste material at U.S. Scrap site.

2 Q Okay. So, whatever the name, just taking
3 the facility at approximately 123rd and Stony
4 Island, did they also dispose of waste at the 9th
5 Avenue Dump site?

6 A No, I don't think so.

7 Q And do you recall the time period during
8 which this company disposed of waste at the U.S.
9 Scrap site?

10 A As best as I can recollect, I would say
11 1956 to somewhere in 1969.

12 Q And do you recall the the type of waste
13 disposed?

14 A This was the liquid waste from cleaning
15 out semi-tankers that hauled chemicals.

16 Q Do you recall the volume of waste
17 disposed during that time period?

18 A At times it was as much as two or three
19 5,000-gallon tankers a week. And then, again, it
20 might have been a little less at other times.

21 Q Do you recall whether Texaco Company
22 disposed of any waste at the U.S. Scrap site?

23 A Yes, they did.

24 Q Do you recall whether Texaco Company

1 disposed of any waste at the 9th Avenue Dump site?

2 A Yes, they did.

3 Q Do you recall the location of the
4 facility which disposed of those wastes?

5 A The Lockport, Illinois refinery.

6 Q Do you recall the time period during
7 which those wastes were disposed?

8 A 1971 until 1973.

9 Q Do you recall the type of waste disposed?

10 A Oil and gasoline sludge.

11 Q And do you recall the volume of waste
12 disposed?

13 A Approximately 1,000 to 2,000 gallons of
14 sludge from the trucks that did the cleaning at
15 the tank farm.

16 Q Can you explain that a little more for
17 me?

18 A Well, the Vac Alls went to the Texaco
19 refinery and cleaned out the tanks, and Texaco had
20 a kind of a Mickey Mouse dump at the east end of
21 their property and we would, like, quickly just
22 dump the load out. But the load never all came
23 out, and it was time to get out of the facility
24 because you had to get out by a certain time. So

1 then what we did is we went out to our place,
2 which is U.S. Scrap site, and cleaned the tank out
3 for the next day -- our tank truck, that is.

4 Q Do you recall whether any full loads were
5 hailed from Texaco to U.S. Scrap or 9th Avenue?

6 A I don't remember.

7 Q Do you recall whether Thompson Heywood
8 Chemical ever disposed of any waste at the U.S.
9 Scrap site?

10 A I am not sure.

11 Q Do you recall whether Thompson Heywood
12 Chemical ever disposed of any waste at the 9th
13 Avenue Dump site?

14 A In my original statement I said, "I don't
15 remember at this time," but in, again, going
16 through all the notes and all the ledger sheets
17 and that there, it turned out to be yes, they did.

18 Q Okay. Do you recall the location of the
19 facility which disposed of those wastes?

20 A 2501 South Damen Avenue, Chicago,
21 Illinois.

22 Q Do you recall the time period during
23 which those wastes were disposed?

24 A Approximately 1974, 1975.

1 Q Do you recall the type of waste disposed?

2 A Some type of chemicals.

3 Q Do you recall the volume of waste
4 disposed during that time period?

5 A No, I don't. I believe the material was
6 hauled in drums.

7 Q Do you recall whether Stewart-Warner
8 Company ever disposed of any waste at the U.S.
9 Scrap site?

10 A I don't think so.

11 Q Do you recall whether Stewart-Warner
12 Company ever disposed of any waste at the 9th
13 Avenue Dump site?

14 MS. TIGHE: Off the record.

15 (Discussion held off the record.)

16 MR. KOWALSKI: Can you please read the last
17 question?

18 (Record read.)

19 BY THE WITNESS:

20 A Yes, they did.

21 BY MR. KOWALSKI:

22 Q Do you recall whether that company
23 operated under any other name when you hauled for
24 it?

1 A I believe it's Thor Power Tool Company.

2 Q Do you recall the location of the
3 facility which disposed of waste at the 9th Avenue
4 Dump site?

5 A I think it's 175 North State Street,
6 Aurora, Illinois.

7 Q And do you recall the time period during
8 which those wastes were disposed?

9 A 1974 to 1975.

10 Q Do you recall the type of waste disposed?

11 A I think it's some type of oily waste.

12 Q Do you recall the volume of waste
13 disposed during that time period?

14 A It's three to four times a year.

15 Q Okay. And do you recall the size of the
16 load?

17 A No, I don't. Not at this time.

18 Q Do you recall whether Baxter Travenol
19 Labs disposed of any waste at the U.S. Scrap site?

20 A Not at this time.

21 Q Do you recall whether Baxter Travenol
22 Labs disposed of any waste at the 9th Avenue Dump
23 site?

24 A Not at this time.

1 Q Do you recall whether Triple S. Etchants
2 ever disposed of any waste at the U.S. Scrap site?

3 A Yes, they did.

4 Q Do you recall whether Triple S. Etchants
5 ever disposed of any waste at the 9th Avenue Dump
6 site?

7 A I'm not sure at this time.

8 Q Do you recall whether -- strike that.

9 Do you recall the location of the
10 facility from which Triple S. Etchants disposed of
11 waste at the U.S. Scrap site?

12 A 1084 Industrial Drive, Bensenville,
13 Illinois.

14 Q Do you recall the time period during
15 which it disposed of those wastes?

16 A 1972 to 1973.

17 Q Do you recall the type of waste disposed?

18 A I believe it's acid waste.

19 Q Do you recall the volume of waste
20 disposed?

21 A I'm not sure at this time.

22 Q Do you recall ever going to the Triple S.
23 Etchants facility yourself?

24 A No, I don't remember at this time.

1 Q Do you recall whether Triumph Twist Rail
2 ever disposed of any waste at the U.S. Scrap site?
3 Would you like to add something, Mr. Martell?

4 A Yeah, I remember now. I picked up that
5 thing. It was a small load of drums. See, I
6 couldn't make out my writing here.

7 Q Okay. You are referring to the notes
8 that you made on your earlier statement?

9 A Right, on the original statement. I made
10 notes as things came out of the other references I
11 had, and we picked up and I drove a rented truck,
12 I believe it was, and picked up a small load of
13 four to six drums at this factory.

14 Q And this factory being which factory?

15 A This is Triple S. Etchants.

16 Q Okay. Do you recall whether Triumph
17 Twist Rail ever disposed of any waste at the U.S.
18 Scrap site?

19 A Yes, they did.

20 Q Do you recall whether Triumph Twist Rail
21 ever disposed of any waste at the 9th Avenue Dump
22 site?

23 A No, they didn't.

24 Q Do you recall the location of the

1 facility which disposed of those wastes?

2 A Rhineland, Wisconsin.

3 Q Do you recall the time period during
4 which it disposed of those wastes?

5 A Approximately somewhere around 1970 or
6 1971.

7 Q Do you recall the type of waste disposed?

8 A Some type of solvents or it was oils.

9 Q Do you recall the volume of wastes
10 disposed at those -- at the U.S. Scrap site?

11 A Yeah, It was my -- in my recollection,
12 the one I remember, it was only 3,000 gallons in a
13 tanker. That's all the tanker held. And I
14 brought the tanker there. I didn't go get it, but
15 I brought the tanker there and I spotted the
16 tanker. We had just gotten a brand new tractor,
17 and I took it for a ride because Rhineland
18 seemed like a nice place to go in a tractor.

19 Q When you say you spotted the trailer, you
20 took an empty trailer there and left it to be
21 filled?

22 A Yes, right.

23 Q And that was later picked up and disposed
24 of?

1 A Right.

2 Q Okay. Do you recall any other pickups at
3 that facility other than that one occasion?

4 A Not at this time.

5 Q Do you recall whether U.S. Envelope ever
6 disposed of any waste at the U.S. Scrap site?

7 A Yes, they did.

8 Q Do you recall whether U.S. Envelope ever
9 disposed of any waste at the 9th Avenue Dump site?

10 A Yes, they did.

11 Q Do you recall the location of the
12 facility which disposed of those wastes?

13 A North Chicago, Illinois.

14 Q Do you recall the time period during
15 which those wastes were disposed?

16 A 1974 to 1975.

17 Q Do you recall the type of waste disposed?

18 A Solvents, glues and inks.

19 Q Do you recall the volume of waste
20 disposed at the two sites?

21 A 30 to 40 drums per month.

22 Q Do you recall whether U.S. Reduction
23 Company ever disposed of any waste at the U.S.
24 Scrap site?

1 A No, they didn't.

2 Q Do you recall whether U.S. Reduction
3 Company ever disposed of any waste at the 9th
4 Avenue Dump site?

5 A Yes, they did.

6 Q Do you recall the location of the
7 facility which disposed of those wastes?

8 A Chicago Avenue and Kennedy Avenue in East
9 Chicago, Indiana.

10 Q Do you recall the time period during
11 which those wastes were disposed?

12 A In my original statement, I said, "1973
13 to '75." On further thinking and looking through
14 my notes, I would like to make that 1974 until
15 some time in 1975.

16 Q And do you recall the type of waste
17 disposed?

18 A Aluminum dust from -- I believe it's from
19 the cleaning up and from the precipitators and all
20 that.

21 Q And do you recall the volume of aluminum
22 dust disposed of at the 9th Avenue Dump site?

23 A Five to ten truck loads a day.

24 Q When you say truck loads, what particular

1 kind of truck would that be?

2 A These would be about eight- to ten-yard
3 rolloff trucks. It looks like a dump truck going
4 down the street, but it's really like a truck that
5 has a container that slides off on the ground, you
6 know, but being that the stuff is so heavy, it has
7 to be a small container. It can't carry a whole
8 lot of stuff.

9 Q So that would be five to ten trucks
10 carrying eight to ten yards?

11 A Right.

12 Q Do you recall whether U.S. Steel Gary
13 Works ever disposed of any waste at the U.S. Scrap
14 site?

15 A No, they didn't.

16 Q Do you recall whether U.S. Steel Gary
17 Works ever disposed of any waste at the 9th Avenue
18 Dump site?

19 A No, they didn't.

20 Q Do you recall ever having any business
21 transactions with U.S. Steel Gary Works on behalf
22 of U.S. Scrap Corporation?

23 A Yes, we worked in there with the Vac Alls
24 with labor, doing manual cleanup, and that. But

1 U.S. Steel Gary Works has a huge, vast dump of
2 their own. I believe it's on the east end of
3 their property, and wherever you pick you dumped
4 there. I think our work involved only dry
5 material, bricks and dust and stuff like that.

6 Q And that would be deposited on their
7 property?

8 A On their site, yes, sir.

9 Q Do you recall whether U.S. Steel Products
10 ever disposed of any waste at the U.S. Scrap site?

11 A Yes, they did.

12 Q Do you recall whether U.S. Steel Products
13 ever disposed of any waste at the 9th Avenue Dump
14 site?

15 A Yes, they did.

16 Q Do you recall the location of the
17 facility which disposed of those wastes?

18 A 13700 South Harvard, Dolton, Illinois.

19 Q Do you recall the time period during
20 which it disposed of those wastes?

21 A Approximately 1971 until 1975.

22 Q Do you recall the type of waste disposed?

23 A Paints and solvents in drums.

24 Q And do you recall the volume of waste

1 disposed over at those two sites?

2 A Approximately 70 to 80 drums each month.

3 Q Do you recall whether U.S. Steel South
4 Works ever disposed of any waste at the U.S. Scrap
5 site?

6 A Yes, they did.

7 Q Do you recall whether U.S. Steel South
8 Works ever disposed of any waste at the 9th Avenue
9 Dump site?

10 A No, they didn't.

11 Q Do you recall the location of the
12 facility which disposed of waste at the U.S. Scrap
13 site?

14 A 3426 East 89th Street, Chicago, Illinois.

15 Q Do you recall the time period during
16 which those wastes were disposed?

17 A It would be some time in 1971 or 1972.

18 Q Do you recall the type of waste disposed?

19 A Sulfuric acid.

20 Q And do you recall the volume of waste
21 disposed of at the site?

22 A It was one load of 4,000 gallons. And
23 the reason I remember this one so good is that it
24 set the place on fire. It was on a Saturday

1 afternoon, and we were trying to go some place and
2 that took care of the whole Saturday afternoon.

3 Q When you say it set the place on the
4 fire, you mean the 9th Avenue Dump site?

5 A No, the U.S. Scrap site.

6 Q Oh, I am sorry. Do you recall whether
7 Union Camp ever disposed of any waste at the U.S.
8 Scrap site?

9 A Yes, they did.

10 Q Do you recall whether Union Camp ever
11 disposed of any waste at the 9th Avenue Dump site?

12 A Yes, they did.

13 Q Do you recall the location of the
14 facility which disposed of those wastes?

15 A 100 Oakton Street, Des Plaines, Illinois.

16 Q Do you recall the time period during
17 which those wastes were disposed?

18 A In the original statement I said, "19 --
19 approximately 1972 to 1973." In more research, I
20 would like to make that 1972 until 1974.

21 Q Do you recall the type of waste disposed
22 during that time period?

23 A Inks, solvents, paints and oils.

24 Q Do you recall the volume of waste

1 disposed during that time period?

2 A I believe it was two to three loads, and
3 a load would consist of 40 to 50 drums. And I
4 picked up one of those loads myself. I went back
5 not too long ago to make sure that this was the
6 same one because I had it confused with another
7 name. So, to be sure it would be the right
8 factory, I drove out to Des Plaines and I went to
9 the exact spot where I loaded, and the drums are
10 still there like they were when I picked them up.

11 Q Do you recall whether Uniroyal,
12 Incorporated ever disposed of any waste at the
13 U.S. Scrap site?

14 A Yes, they did.

15 Q Do you recall whether Uniroyal ever
16 disposed of any waste at the 9th Avenue Dump site?

17 A Yes, they did.

18 Q Do you recall the location of the
19 facility which disposed of those wastes?

20 A Mishawaka, Indiana.

21 Q Do you recall the time period during
22 which those wastes were disposed?

23 A Approximately 1971 until 1975.

24 Q Do you recall the type of waste disposed?

1 A I believe it was solvents, adhesives and
2 plastics.

3 Q Do you recall the volume of waste
4 disposed during that time period?

5 A About 300 to 500 drums per month, like I
6 said in my original statement, but, again, like
7 all factories, there were times when there was a
8 little less and there were times when it was a
9 little more. And they also had a -- about once a
10 week they had a 4,000-gallon tanker load of some
11 type of solvents or something. I --

12 Q Do you recall -- I am sorry. Go ahead.

13 A -- I believe the man we dealt with was
14 Bob Nagle.

15 Q That would be the contact person at the
16 plant?

17 A Yeah. I don't remember what his title
18 would be, but, like you say, he is a contact
19 person. That would be his area of authority,
20 making sure that waste moved and the vendor was
21 there to pick it up.

22 Q Do you recall whether United Wallpaper
23 ever disposed of any waste at the U.S. Scrap site?

24 A Yes, they did.

1 Q Do you recall whether United Wallpaper
2 ever disposed of waste at the 9th Avenue Dump
3 site?

4 A No, they didn't.

5 Q Do you recall the location of the
6 facility which disposed of waste at the U.S. Scrap
7 site?

8 A 3101 South Kedzie Avenue, Chicago,
9 Illinois.

10 Q And do you recall the time period during
11 which it disposed of those wastes?

12 A 1965 until 1967.

13 Q Do you recall the type of waste disposed?

14 A Wallpaper, paste, paints and adhesives.

15 Q And do you recall the volume of waste
16 disposed during that time period?

17 A My estimate is that we picked up probably
18 a total of somewhere between 100 to 200 drums in
19 the time frame. And I was there myself many, many
20 times picking up stuff. And this is a division of
21 DeSoto Chemical.

22 Q Do you recall whether Val Spar ever
23 disposed of any waste at the U.S. Scrap site?

24 A Yes, they did.

1 Q Do you recall whether Val Spar ever
2 disposed of any waste at the 9th Avenue Dump site?

3 A Yes, they did.

4 Q Do you recall the location of the
5 facility which disposed of those wastes?

6 A 200 Sawyer, Rockford, Illinois and 7701
7 West 47th Street, Lyons, Illinois.

8 Q Okay. Do you recall the time period
9 during which Val Spar disposed of those wastes?

10 A 1965 until 1975.

11 Q Do you recall the type of waste disposed?

12 A Paints, resins, thinner, oil and varnish.

13 Q And do you recall the volume of waste
14 disposed during that time period?

15 A Two to three trailer loads of drums a
16 month. And I picked up at the 47th Street plant a
17 couple times myself. I loaded the trailer.

18 Q Do you recall whether Vandercook ever
19 disposed of any waste at the U.S. Scrap site?

20 A I don't think so.

21 Q Do you recall whether Vandercook ever
22 disposed of any waste at the 9th Avenue Dump site?

23 A Yes, they did.

24 Q Do you recall the location of the

1 facility from which they disposed of those wastes?

2 A It's 3601 West Touhy Avenue, Lincolnwood,
3 and it's Vandercook Division of Illinois Tool
4 Works.

5 Q Do you recall the time period during
6 which it disposed of those wastes?

7 A 1974, 1975.

8 Q Do you recall the type of wastes
9 disposed?

10 A I believe it's oil.

11 Q And do you recall the volume disposed?

12 A In you my original statement I says, "I
13 didn't remember at the time," but, again, in
14 going through papers, I believe it's about 2 to
15 3 000 gallons a month. That would be in a vacuum
16 tanker.

17 Q Do you recall whether Velsicol Chemical
18 ever disposed of any waste at the U.S. Scrap site?

19 A Yes, they did.

20 Q Do you recall whether Velsicol Chemical
21 ever disposed of any waste at the 9th Avenue Dump
22 site?

23 A Yes, they did.

24 Q And do you recall the location of the

1 facility from which those wastes were disposed?

2 A It's 340 East Ohio Street. And in my
3 original statement I says, "3500 North Kimball
4 Avenue," and somehow there is no record of any
5 place of any address like that in the Illinois
6 Manufacturers Directory. But I vaguely remember
7 going with Dave to some place around there and
8 we -- talking to the driver, he confirms my
9 recollection that there was two plants, that we
10 picked up at two places. I seem to remember two
11 plants, but it doesn't show in the book.

12 Q Okay. Do you recall the time period
13 during which Velsicol Chemical disposed of waste
14 at the two sites?

15 A 1966 until 1975.

16 Q And do you recall the type of waste?

17 A Insecticides, pesticides and biological
18 chemicals.

19 Q Do you recall the volume of waste
20 disposed during that time period?

21 A Approximately 20 to 50 drums per month
22 combined from both facilities.

23 Q Do you recall any individuals from
24 Velsicol Chemical with whom you dealt with, Mr.

1 Martell?

2 A No, just that I knew that at one time it
3 was -- David told me that they had hired a new
4 lady purchasing agent, and I believe she was
5 Italian. That's about all I can remember. So,
6 that would be somewhere around '72 or '73,
7 somewhere around there.

8 Q Do you recall whether Venus Laboratories
9 ever disposed of any waste at the U.S. Scrap site?

10 A I don't think so.

11 Q Do you recall whether Venus Laboratories
12 ever disposed of any waste at the 9th Avenue Dump
13 site?

14 A Yes, they did.

15 Q Do you recall the location of the
16 facility which disposed of those wastes?

17 A 855 Lively Boulevard, Wood Dale,
18 Illinois.

19 Q Do you recall the time period during
20 which it disposed of those wastes?

21 A I believe it's 1974 or 1975.

22 Q And do you recall the type of waste
23 disposed?

24 A I am not sure, but it was some type of

1 chemical.

2 Q Do you recall the volume of waste
3 disposed during that time period?

4 A One tanker load per month, and a tanker
5 held 4,000 to 5,000 gallons of waste.

6 Q Do you recall whether Victor Gasket ever
7 disposed of any waste at the U.S. Scrap site?

8 A Yes, they did.

9 Q Do you recall whether Victor Gasket ever
10 disposed of any waste at the 9th Avenue Dump site?

11 A Yes, they did.

12 Q Do you recall the location of the
13 facility which disposed of those wastes?

14 A 5750 West Roosevelt Road, Chicago,
15 Illinois.

16 Q Do you recall the time period during
17 which it disposed of those wastes?

18 A Approximately 1969 until 1975.

19 Q Do you recall the type of waste disposed?

20 A Oil, solvents and chemicals of some type.

21 Q And do you recall the volume of waste
22 disposed?

23 A Approximately 50 to 80 drums per month.

24 Q Do you recall whether W.C. Richards ever

1 disposed of any waste at the U.S. Scrap site?

2 A Not at this time.

3 Q Do you recall whether W.C. Richards ever
4 disposed of any waste at the 9th Avenue Dump site?

5 A Not at this time.

6 Q Do you recall whether William Wrigley
7 Company ever disposed of any waste at the U.S.
8 Scrap site?

9 A Yes, they did.

10 Q Do you recall whether William Wrigley
11 Company ever disposed of any waste at the 9th
12 Avenue Dump site?

13 MS. TIGHE: Off the record.

14 (Discussion held off the record.)

15 MR. KOWALSKI: Will you please read back the
16 last question?

17 (Record read.)

18 BY THE WITNESS:

19 A Yes, they did.

20 MS. TIGHE: At 9th Avenue?

21 THE WITNESS: Oh, wait a while.

22 BY MR. KOWALSKI:

23 Q Okay. Would you like to change that
24 answer, Mr. Martell?

1 A Yes. I got confused. I thought we were
2 starting all over again. No, I am not sure about
3 the 9th Avenue site. I am only sure about the
4 U.S. Scrap site.

5 Q Okay. Do you recall the location of the
6 facility which delivered waste to the U.S. Scrap
7 site?

8 A 3535 South Ashland Avenue, Chicago,
9 Illinois.

10 Q And do you recall the time period during
11 which it delivered those wastes?

12 A Some time around 1973.

13 Q Do you recall the type of waste disposed?

14 A I am not sure of the type of waste, but
15 it was in steel drums.

16 Q And do you recall the volume of waste
17 disposed?

18 A Not at this time.

19 Q Do you recall whether Warner Electric
20 ever disposed of any waste at the U.S. Scrap site?

21 A I don't believe they did.

22 Q Do you recall whether Warner Electric
23 ever disposed of any waste at the 9th Avenue Dump
24 site?

1 A Yes, they did.

2 Q Do you recall the location of the
3 facility which disposed of those wastes?

4 A 1512 Jarvis Avenue and that's in Chicago.

5 Q Do you recall the time period during
6 which it disposed of those wastes?

7 A Some time around 1975.

8 Q Do you recall the type of waste disposed?

9 A I am not sure of that, but it was in
10 drums.

11 Q Do you recall the volume of waste
12 disposed?

13 A Not at this time.

14 Q Do you recall whether Warwick Electronics
15 ever disposed of any waste at the U.S. Scrap site?

16 A I don't believe they did.

17 Q Do you recall whether Warwick Electronics
18 ever disposed of any waste at the 9th Avenue Dump
19 site?

20 A Yes, they did.

21 Q Do you recall the location of the
22 facility which disposed of those wastes?

23 A It's 7300 North Lehigh Avenue, Niles,
24 Illinois. And Warwick is a subsidiary of

1 Whirlpool Corporation.

2 Q Do you recall the time period during
3 which Warwick disposed of waste at the 9th Avenue
4 Dump site?

5 A About 1975.

6 Q Do you recall the type of waste disposed?

7 A I am not sure, but this was in drums.

8 Q And do you recall the volume of waste
9 disposed?

10 A Not at this time.

11 Q Do you recall whether Western Electric
12 ever disposed of any waste at the U.S. Scrap site?

13 A I don't think so -- oh, wait a while. I
14 am sorry. This is backwards. You -- can we stop
15 for a minute?

16 Q No, go ahead with your answer. The
17 question was whether Western Electric ever
18 disposed of any waste at the U.S. Scrap site?

19 A Yes. It's yes to the U.S. Scrap site,
20 yes.

21 Q And do you recall whether Western
22 Electric ever disposed of any waste at the 9th
23 Avenue Dump site?

24 A No, they did not.

1 Q Do you recall the location of the
2 facility from which Western Electric disposed of
3 waste at the U.S. Scrap site?

4 A It was the Hawthorne Works at 22nd and
5 Cicero Avenue, Cicero, Illinois.

6 Q Do you recall the time period during
7 which those wastes were disposed?

8 A Approximately 1965 till about 1970.

9 Q And do you recall the type of waste
10 disposed?

11 A A lot of chlorinated solvents, acids,
12 varnishes, oils and paints.

13 Q And do you recall the volume of wastes
14 disposed over that time period?

15 A Approximately 200 to 300 drums per month.

16 Q Do you recall ever going out to that
17 facility yourself?

18 MS. TIGHE: Off the record.

19 (Discussion held off the record.)

20 MR. KOWALSKI: Would you please read back the
21 last question?

22 (Record read.)

23 BY THE WITNESS:

24 A You mean Western Electric?

1 BY MR. KOWALSKI:

2 Q Yes.

3 A No, but I remember distinctly handling
4 these drums in this particular company because
5 after a while, we started to develop a way of
6 starting to segregate the stuff and I remember
7 they had these chlorinated solvents. And, also,
8 another thing, they had bad drums. By that, I
9 mean they had drums that were cut open and then
10 resealed, and I guess they couldn't use them on
11 the reconditioners because of that reseaming. And
12 we had to, like, chop them out and sell them for
13 garbage cans.

14 Q I notice that that company only remained
15 a customer until 1970. Was there any particular
16 reason you stopped hauling for them in '70?

17 A No, you know, they just found somebody
18 else or somebody walked in there with a better
19 deal or a different way of handling than we did.
20 You know, we constantly got people and we would
21 lose people and, you know, there was competition
22 out there. There were people trying to get your
23 business and people watching us on what we were
24 doing and, you know -- I don't know for sure why

1 we lost them to answer your question.

2 Q Do you recall whether Wilson Sporting
3 Goods ever disposed of any waste at the U.S. Scrap
4 site?

5 A Yes, they did.

6 Q Do you recall whether Wilson Sporting
7 Goods ever disposed of any waste at the 9th Avenue
8 Dump site?

9 A Yes, they did.

10 Q Do you recall the location of the
11 facility which disposed of those wastes?

12 A 2233 West Street, River Grove, Illinois.

13 Q And do you recall the time period during
14 which it disposed of those wastes?

15 A Approximately 1973 until 1975.

16 Q Do you recall the type of waste disposed?

17 A I am not sure, but it was some type of
18 chemicals.

19 Q And do you recall the volume disposed
20 during that time period?

21 A No, I don't know the volume, but this
22 material was transported in drums.

23 Q Do you recall whether Witco Chemical ever
24 disposed of any waste at the U.S. Scrap site?

1 A Not at this time.

2 Q Do you recall whether Witco Chemical ever
3 disposed of waste at the 9th Avenue Dump site?

4 A Not at this time.

5 Q Do you recall whether Wyco Tool Company
6 ever disposed of any waste at the U.S. Scrap site?

7 A Yes, they did.

8 Q Do you recall whether Wyco Tool Company
9 ever disposed of any waste at the 9th Avenue Dump
10 site?

11 A Yes, they did.

12 Q Do you recall the location of the
13 facility which disposed of those wastes?

14 A 4601 West Addison Street, Chicago,
15 Illinois.

16 Q Do you recall the time period during
17 which those wastes were disposed?

18 A Approximately 1973 until 1975.

19 Q Do you recall the type of waste disposed?

20 A I believe it was some type of oil.

21 Q Do you recall any other waste?

22 A No.

23 Q Do you recall the volume of waste
24 disposed during that time period?

1 A No, I don't remember the volume at this
2 time. I'm not sure.

3 Q Do you recall whether Wyckof Steel
4 Company ever disposed of waste at the U.S. Scrap
5 site?

6 A Yes, they did.

7 Q Do you recall whether Wyckof Steel
8 Company ever disposed of waste at the 9th Avenue
9 Dump site?

10 A Yes, they did.

11 Q Do you recall the location of the
12 facility which disposed of this waste?

13 A 3200 South Kedzie Avenue, Chicago,
14 Illinois.

15 Q Do you recall the time period during
16 which the waste was disposed?

17 A 1973 to 1974.

18 Q Do you recall the type of waste disposed?

19 A Some type of acid.

20 Q Do you recall the volume of waste
21 disposed?

22 A One tanker load per month, and it might
23 vary between 2,000 to as high as 4,000 gallons in
24 the load.

1 Q Do you recall whether Wyman Gordon ever
2 disposed of any waste at the U.S. Scrap site?

3 A Yes, they did.

4 Q Do you recall whether Wyman Gordon ever
5 disposed of any waste at the 9th Avenue Dump site?

6 A Yes, they did.

7 Q Do you recall the location of the
8 facility which disposed of those wastes?

9 A 14600 South Wood Street, Harvey,
10 Illinois.

11 Q Do you recall the time period during
12 which this waste was disposed?

13 A 1973 until 1975.

14 Q Do you recall the type of waste?

15 A Some sort of acid waste.

16 Q And do you recall the volume of waste
17 disposed?

18 A About 4,000 gallons every other month.

19 Q Do you recall whether Xerox Corporation
20 ever disposed of any waste at the U.S. Scrap site?

21 A Yes, they did.

22 Q Do you recall whether Xerox Corporation
23 ever disposed of any waste at the 9th Avenue Dump
24 site?

1 A Yes, they did.

2 Q Do you recall the location of the
3 facility which disposed of those wastes?

4 A 1808 Swift Drive, and I believe it's Oak
5 Brook, Illinois.

6 Q Do you recall the time period during
7 which those wastes were disposed?

8 A Approximately 1970 until 1975.

9 Q Do you recall the type of waste disposed?

10 A Chemicals, solvents and oils.

11 Q Do you recall the volume of waste
12 disposed during that time period?

13 A Five to ten drums per month. And I went
14 there myself to pick up one load for sure. It's a
15 very hard place to find.

16 Q Do you recall whether Miller Pre-Pared
17 Pctatoes ever disposed of any waste at the U.S.
18 Scrap site?

19 A I don't think so. I am not sure. I
20 dcn't think so.

21 Q Do you recall whether Miller Pre-Pared
22 Pctatoes ever disposed of any waste at the 9th
23 Avenue Dump site?

24 A Yes, they did.

1 Q Do you recall the location of the
2 facility which disposed of those wastes?

3 A 140th Street and Western Avenue, Posen,
4 Illinois.

5 Q Do you recall the time period during
6 which those wastes were disposed?

7 A Approximately some time around 1975.

8 Q And do you recall the type of waste?

9 A I believe it was potatoe waste.

10 Q Do you recall any waste other than food
11 waste?

12 A No, I don't at this time.

13 Q And do you recall the volume of waste
14 disposed during that time period?

15 A I believe it was about 10,000 gallons per
16 year.

17 Q So that would be a total of 10,000
18 gallons?

19 A 10,000 gallons, yes, sir.

20 Q Do you recall whether Whiting Corporation
21 ever disposed of any waste at the U.S. Scrap site?

22 A I'm not sure.

23 Q Do you recall whether Whiting Corporation
24 ever disposed of any waste at the 9th Avenue Dump

1 site?

2 A Yes, they did.

3 Q Do you recall the location of the
4 facility which disposed of those wastes?

5 A 157th Street and Lathrop Avenue, Harvey,
6 Illinois.

7 Q And do you recall the time period during
8 which those wastes were disposed?

9 A 1974 to 1975.

10 Q And do you recall what type of waste was
11 disposed?

12 A Some type of oil.

13 Q Do you recall the volume of waste
14 disposed during that time period?

15 A Two to three tanker loads in a year. And
16 the tanker might hold 3,000 to 4,000 gallons.

17 Q Do you recall whether Wilson & Company
18 ever disposed of any waste at the U.S. Scrap site?

19 A Yes, they did.

20 Q Do you recall whether Wilson & Company
21 ever disposed of any waste at the 9th Avenue Dump
22 site?

23 A I don't think they did.

24 Q Do you recall the location of the

1 facility which disposed of those wastes?

2 A I believe it's Plumber Street and
3 Wentworth Avenue in Calumet City, Illinois.

4 Q Mr. Martell, you earlier mentioned Wilson
5 & Company that disposed of bone slurry rendering
6 sludge, is this a different Wilson than the
7 company?

8 A This is different facility. Right.

9 Q Okay. Do you recall the time period
10 during which Wilson & Company disposed of waste at
11 the U.S. Scrap site?

12 A I believe it was 1971 till about 1973.

13 Q Do you recall the type of waste disposed?

14 A Some type of chemical. I am not sure
15 what it is though.

16 Q Do you recall the volume of waste
17 disposed during that time period?

18 A They generated approximately two to three
19 tanker loads a month. There would be around 4,000
20 gallons in a load, in a tanker load.

21 Q Do you recall whether Ferro Engineering
22 ever disposed of any waste at the U.S. Scrap site?

23 A Yes, they did.

24 Q Do you recall whether Ferro Engineering

1 ever disposed of any waste at the 9th Avenue Dump
2 site?

3 A No, they did not.

4 Q Do you recall the location of the
5 facility which disposed of waste at the U.S. Scrap
6 site?

7 A State and Burnham Road in Calumet City,
8 Illinois.

9 Q Do you recall the time period during
10 which those wastes were disposed?

11 A Approximately some time around 1970 to
12 1971.

13 Q And do you recall the type of waste?

14 A Some kind of a white sludge from their
15 factory pits. I went along with the truck, and we
16 had a lot of difficulty, you know, getting that
17 material out of the pits.

18 Q Okay. Do you recall the volume of waste
19 disposed?

20 A I would say that it was a total of 2,000
21 to 3,000 gallons. It was a one-time job.

22 MS. TIGHE: Off the record.

23 (Discussion held off the record.)

24 MR. KOWALSKI: Back on.

1 BY MR. KOWALSKI:

2 Q Mr. Martell, do you recall whether Bulk
3 Terminal Transport ever disposed of any waste at
4 the U.S. Scrap site?

5 A I am not sure, but I think they did.

6 Q Okay. Do you recall whether Bulk
7 Terminal Transport ever disposed of any waste at
8 the 9th Avenue Dump site?

9 A I am not sure on that one.

10 Q Do you recall the location of the
11 facility which you believe disposed of waste at
12 the U.S. Scrap site?

13 A Yes, I believe it's approximately 124th
14 and Stony Island Avenue or a little bit to the
15 west of Stony Island at 124th Street.

16 Q Okay. Is this a separate facility than
17 the Terminal Transport you had discussed earlier?

18 A I believe it is. I think it's like a
19 tank storage area.

20 Q Okay. And do you recall the time period
21 during which you believe Bulk Terminal Transport
22 disposed of waste at the U.S. Scrap site?

23 A I am going to say probably 1970, '71 or
24 '72 somewhere in that area there.

1 Q Okay. You stated earlier in your
2 statement in May that it was approximately 1966 to
3 1969. Is there any specific reason for your
4 change of dates?

5 A Well, that's because I thought Bulk
6 Terminal Transport was the one on 123rd and Stony
7 Island where we had gotten that stuff out -- where
8 they clean tankers out. But I remember now that
9 was a facility and there was also this tank
10 storage area a little bit to the south and a
11 little bit to the west and we went in there with
12 vacuum tankers, as best I can recollect, and we
13 did some work so that they could do some work on
14 those tanks, you know. But as to what we took out
15 there, I am not sure.

16 Q Okay. Do you recall how much you took
17 out of there?

18 A I don't remember that either.

19 Q Was that a one-time thing?

20 A Yes, it was a one-time job.

21 MR. KOWALSKI: Okay. Off the record.

22 (Discussion held off the record.)

23 MR. KOWALSKI: We will take a lunch and

24 reconvene at 2:00.

1 (Whereupon, the deposition was
2 recessed for lunch, to reconvene
3 at
4 2:00 o'clock p.m. this date.)

5 BY MR. KOWALSKI:

6 Q Mr. Martell, do you recall whether
7 Accutronics disposed of any waste at the U.S.
8 Scrap site?

9 A I am not sure at this time.

10 Q Do you recall whether Accutronics ever
11 disposed of any waste at the 9th Avenue Dump site?

12 A I am not sure at this time.

13 Q Do you recall whether Active Service ever
14 disposed of any waste at the U.S. Scrap site?

15 A I am not sure at this time.

16 Q Do you recall whether Active Service ever
17 disposed of any waste at the 9th Avenue Dump site?

18 A I don't remember at this time.

19 Q Do you recall whether Advance Transformer
20 ever disposed of any waste at the U.S. Scrap site?

21 A Yes, they did.

22 Q Do you recall whether Advance Transformer
23 ever disposed of any waste at the 9th Avenue Dump
24 site?

1 A I believe they did.

2 Q Do you recall the location of the
3 facility which disposed of those wastes?

4 A 2950 North Western Avenue, Chicago,
5 Illinois.

6 Q Do you recall the time period during
7 which those wastes were disposed?

8 A Approximately 1970 until 1973.

9 Q Do you recall the type of waste disposed?

10 A Oils and other chemicals.

11 Q Do you recall the volume of waste
12 disposed?

13 A About 40 to 50 drums were picked up every
14 two or three months.

15 Q Do you recall whether Albany ever
16 disposed of any waste at the U.S. Scrap site?

17 A Not that I remember at this time.

18 Q Do you recall whether Albany ever
19 disposed of any waste at the 9th Avenue Dump site?

20 A I am not sure at this time.

21 Q Do you recall whether Alco-Gravier ever
22 disposed of any waste at the U.S. Scrap site?

23 A Yes, they did.

24 Q Do you recall whether Alco-Gravier ever

1 disposed of any waste at the 9th Avenue Dump site?

2 A Yes, they did.

3 Q Do you recall the location of the
4 facility which disposed of those wastes?

5 A 16th Street and Western Avenue in
6 Chicago, Illinois.

7 Q And do you recall the time period during
8 which those wastes were disposed?

9 A 1970 until 1975.

10 Q Do you recall the type of waste disposed?

11 A I believe it was inks, solvents and oils.

12 Q Do you recall the volume of waste
13 disposed?

14 A Not at this time.

15 Q Do you recall whether Allis Chalmers ever
16 disposed of any waste at the U.S. Scrap site?

17 A Yes, they did.

18 Q Do you recall whether Allis Chalmers ever
19 disposed of any waste at the 9th Avenue Dump site?

20 A Yes, they did.

21 Q Do you recall the location of the
22 facility which disposed of those wastes?

23 A 151th Street and Halsted Street in
24 Harvey, Illinois.

1 Q Do you recall the time period during
2 which those wastes were disposed?

3 A 1973 until 1975.

4 Q Do you recall the type of waste?

5 A Some type of coolant oil or cutting oil,
6 one of those two.

7 Q Do you recall the volume disposed during
8 that time period?

9 A Approximately 3,000 gallons once or twice
10 a week.

11 Q Do you recall whether American Name Plate
12 ever disposed of any waste at the U.S. Scrap site?

13 A Yes, they did.

14 Q Do you recall whether American Name Plate
15 ever disposed of any waste at the 9th Avenue Dump
16 site?

17 A Yes, they did.

18 Q Do you recall the location of the
19 facility which disposed of those wastes?

20 A 4104 South Kildare Avenue, Chicago,
21 Illinois.

22 Q Do you recall the time period during
23 which those wastes were disposed?

24 A Approximately 1973 until 1975.

1 Q Do you recall the type of waste?

2 A I believe solvents were the waste.

3 Q Do you recall the volume of waste
4 disposed at the two sites?

5 A I believe it was approximately 40 to 50
6 drums every two or three months.

7 Q Do you recall whether American Printers
8 ever disposed of any waste at the U.S. Scrap site?

9 A You mean American Printer Magazine?

10 Q Either American Printer Magazine or
11 American Printers.

12 A I am not sure at this time.

13 Q Okay. Do you recall whether either of
14 those companies ever disposed of any waste at the
15 9th Avenue Dump site?

16 A Well, I think there is an American
17 Printer, but I don't know if there is an American
18 Printer Magazine.

19 Q Okay. Do you recall American Printer
20 Magazine disposing of wastes at either 9th Avenue
21 Dump site or U.S. Scrap site?

22 A Not at this time.

23 Q Okay. So, let's deal with just -- you
24 believe American Printer?

1 A I believe in my notes I have run across
2 American Printer.

3 Q Okay. And do you recall any waste from
4 American Printer going to either of those two
5 sites?

6 A I am not sure at this time.

7 Q Okay. Do you recall whether waste from
8 American Rivet was disposed of at the U.S. Scrap
9 site?

10 A Yes, they did.

11 Q Do you recall whether American Rivet
12 disposed of any waste at the 9th Avenue Dump site?

13 A Yes, they did.

14 Q Do you recall the location of the
15 facility which disposed of those wastes?

16 A 1130 West Melrose, Franklin Park,
17 Illinois.

18 Q Do you recall the time period during
19 which those wastes were disposed?

20 A Approximately 1968 until 1975.

21 Q Do you recall the types of waste
22 disposed?

23 A Some type of oil. It might have been
24 cooling oil, or it might have been cutting oil.

1 Q Do you recall the volume of waste
2 disposed during that time period?

3 A Approximately 30 to 40 drums every two or
4 three months.

5 Q Do you recall whether Anderson
6 Manufacturing ever disposed of any waste at the
7 U.S. Scrap site?

8 A I believe they did.

9 Q Do you recall whether Anderson
10 Manufacturing ever disposed of any waste at the
11 9th Avenue Dump site?

12 A Yes, they did.

13 Q Do you recall the location of the
14 facility which disposed of those wastes?

15 A Michigan City, Indiana.

16 Q Do you recall the time period during
17 which those wastes were disposed?

18 A Approximately 1973 until 1975.

19 Q Do you recall the type of waste disposed?

20 A I believe it was oil, solvents and
21 varnishes.

22 Q And do you recall the volume of waste
23 disposed over that period of time?

24 A Not at this time.

1 Q Do you recall whether APPCO, A-p-p-c-o,
2 Metal ever disposed of any at waste at the U.S.
3 Scrap site?

4 A Not at this time.

5 Q Do you recall whether APPCO Metal ever
6 disposed of any waste at 9th Avenue Dump site?

7 A Not at this time.

8 Q Do you recall whether Armstrong Chemicals
9 ever disposed of any waste at the U.S. Scrap site?

10 A I don't believe so.

11 Q Do you recall whether Armstrong Chemicals
12 ever disposed of any waste at the 9th Avenue Dump
13 site?

14 A Yes, they did.

15 Q Do you recall the location of the
16 facility which disposed of those wastes?

17 A I believe it was 5108 South Western
18 Boulevard, Chicago, Illinois.

19 Q Do you recall the time period during
20 which those wastes were disposed?

21 A Some time in 1974.

22 Q Do you recall the type of waste disposed?

23 A No, I don't.

24 Q Do you recall the volume of waste?

1 A Not at this time.

2 Q Do you recall whether Avon ever disposed
3 of any waste at the U.S. Scrap site?

4 A I believe they did.

5 Q Do you recall whether Avon ever disposed
6 of any waste at the 9th Avenue Dump site?

7 A Yes, they did.

8 Q Do you recall the location of the
9 facility which disposed of those wastes?

10 A 6901 Golf Road, Morton Grove, Illinois.

11 Q Do you recall the time period over which
12 those wastes were disposed?

13 A I believe it was 1973 and 1974.

14 Q Do you recall the type of waste?

15 A Some type of chemical.

16 Q Do you recall the volume of waste
17 disposed over that time period?

18 A Not at this time.

19 Q Do you recall whether B & J Plastics or
20 B & T Plastics Manufacturing ever disposed of any
21 waste at the U.S. Scrap site?

22 A It was B & T and it's yes.

23 Q Did B & T Plastics ever dispose of waste
24 at the 9th Avenue Dump site?

1 A Yes, they did.

2 Q Do you recall the location of the
3 facility which disposed of wastes at those sites?

4 A 1124 Dodge Avenue, Evanston, Illinois.

5 Q Do you recall the time period over which
6 those wastes were disposed?

7 A Approximately 1973, 1974.

8 Q Do you recall the type of waste disposed?

9 A I am not sure.

10 Q Do you recall the volume of waste
11 disposed over that time period?

12 A I am not sure at this time.

13 Q Do you recall whether Betz, B-e-t-z,
14 Laboratories ever disposed of any waste at the
15 U.S. Scrap site?

16 MS. TIGHE: Off the record.

17 (Discussion held off the record.)

18 MR. KOWALSKI: Can you please read back the
19 last question.

20 (Record read.)

21 BY THE WITNESS:

22 A Yes, they did.

23 BY MR. KOWALSKI:

24 Q Do you recall whether Betz Laboratories

1 ever disposed of any waste at the 9th Avenue Dump
2 site?

3 A I am not sure.

4 Q Do you recall the location of the
5 facility which disposed of waste at the U.S. Scrap
6 site?

7 A 333 South Lombard Road, Addison,
8 Illinois.

9 Q Do you recall the time period over which
10 those wastes were disposed at U.S. Scrap?

11 A The only year I am sure at this time is
12 1972.

13 Q Do you recall the type of waste?

14 A Not at this time.

15 Q Do you recall the volume of waste
16 disposed of?

17 A Not at this time.

18 Q Do you recall whether Boyar Schultz ever
19 disposed of any waste at the U.S. Scrap site?

20 A Yes, they did.

21 Q Do you recall whether Boyar Schultz ever
22 disposed of any waste at the 9th Avenue Dump site?

23 A Yes, they did.

24 Q Do you recall the location of the

1 facility which disposed of those wastes?

2 A 702 Main, Rockford, Illinois.

3 Q And do you recall the period of time over
4 which those wastes were disposed?

5 A 1973 until 1975.

6 Q Do you recall the type of waste?

7 A I believe it was paints, solvents and
8 varnishes.

9 Q And do you recall the volume of waste
10 disposed?

11 A Not at this time.

12 Q Do you recall whether Bruce Horn ever
13 disposed of any waste at the U.S. Scrap site?

14 A Not at this time.

15 Q Do you recall whether Bruce Horn ever
16 disposed of any waste at the 9th Avenue Dump site?

17 A Not at this time.

18 Q Do you recall whether Calumet Screw
19 Machine ever disposed of any waste at the U.S.
20 Scrap site?

21 A Yes, I believe they did.

22 Q Do you recall whether Calumet Screw
23 Machine ever disposed of any waste at the 9th
24 Avenue Dump site?

1 A I don't think so.

2 Q Do you recall the location of the
3 facility which disposed of wastes at the U.S.
4 Scrap site?

5 A 11410 South Western Avenue, Posen,
6 Illinois.

7 Q And do you recall the time period over
8 which those wastes were disposed?

9 A Some time between 1968 and 1970.

10 Q Do you recall the type of waste disposed?

11 A Some type of oil I believe it was.

12 Q And do you recall the volume that was
13 disposed of at the site?

14 A Not at this time.

15 Q Do you recall whether Celofilm ever
16 disposed of any waste at the U.S. Scrap site?

17 A Yes, they did.

18 Q Do you recall whether Celofilm ever
19 disposed of any waste at the 9th Avenue Dump site?

20 A Yes, they did.

21 Q Do you recall the location of the
22 facility which disposed of waste at those sites?

23 A 7252 West 66th Street in Bedford Park,
24 Illinois.

1 Q And do you recall the time period over
2 which those wastes were disposed?

3 A I believe it was between 1973 and 1975.

4 Q Do you recall the type of waste disposed?

5 A No, I am not sure what type of chemical
6 it was.

7 Q But you recall it being a chemical?

8 A Yes, it was.

9 Q Do you recall the volume of waste
10 disposed over that time period?

11 A It was really about 500 to 1,000 drums,
12 in my recollection, that we hauled out of there.
13 That -- and I was there myself at that factory. I
14 was there a couple of times because we did have a
15 problem with that man that ran that place. It's a
16 little hard to remember what the problem was, but
17 I remember walking through the factory, going in
18 and getting my pass because you had to get an
19 authorization to walk around. I know where we
20 loaded the drums and how they brought them out and
21 where the drums stood.

22 Q Did you recently do any investigation
23 regarding that company to refresh your
24 recollection?

1 A Yes, about two weeks ago, I took a ride
2 out there on a Sunday, and I went through the
3 whole Bedford Park area. Principally this one
4 because I remembered in my mind where the factory
5 was and the circumstances surrounding the pickups
6 and the drums and, you know, and the people there,
7 except not by name, and then I had them confused
8 with a different name. So, I wanted to go and
9 make sure I had the right name and luckily the
10 names are all on the building and the building is
11 as I remembered it and the location is the same.

12 Q And when you said 500 to 1,000 drums,
13 that was the total number of drums you recall
14 hauling out of there?

15 A That's the best as I can remember at this
16 time.

17 Q Okay. Do you recall whether Central
18 Scientific ever disposed of any waste at the U.S.
19 Scrap site?

20 A Yes, they did.

21 Q Do you recall whether Central Scientific
22 ever disposed of any waste at the 9th Avenue Dump
23 site?

24 A I don't think they did.

1 Q Do you recall the location of the
2 facility which disposed of waste at the U.S. Scrap
3 site?

4 A 2600 South Kostner Avenue, Chicago,
5 Illinois.

6 Q Do you recall the time period over which
7 the facility disposed of those wastes?

8 A Some time around 1972.

9 Q Do you recall the type of waste?

10 A No, I don't. Not at this time.

11 Q Do you recall the volume of waste
12 disposed?

13 A Not at this time.

14 Q Do you recall whether Chem Trust ever
15 disposed of any waste at the U.S. Scrap site?

16 A I don't remember at this time.

17 Q Do you recall whether Chem Trust ever
18 disposed of any waste at the 9th Avenue Dump Site?

19 A I don't remember at this time.

20 Q Do you recall whether Chicago Adhesive
21 ever disposed of any waste at the U.S. Scrap site?

22 A Yes, they did.

23 Q Do you recall whether Chicago Adhesive
24 ever disposed of any waste at the 9th Avenue Dump

1 site?

2 A Yes, they did.

3 Q Do you recall the location of the
4 facility which disposed of those wastes?

5 A 4758 West 60th Street, Chicago, Illinois.

6 Q Do you recall the time period over which
7 Chicago Adhesive disposed of those wastes?

8 A 1972 until 1975.

9 Q Do you recall the type of waste disposed?

10 A Not at this time -- oh, wait a while.

11 Q Okay. Would you like to change that
12 answer?

13 A Yes. I looked at the wrong line here.
14 On that type of waste it's solvents -- for Chicago
15 Adhesive, it's solvent, adhesives and glues.

16 Q And do you recall the volume of waste
17 disposed at those two sites?

18 A Yes, they had approximately 30 to 50
19 drums about one to two times per year.

20 Q Do you recall whether Chicago Metals ever
21 disposed of any waste at the U.S. Scrap site?

22 A I am not sure at this time.

23 Q Do you recall whether Chicago Metal ever
24 disposed of any waste at the 9th Avenue Dump site?

1 A I am not sure at this time.

2 Q Do you recall whether Chicago Rotoprint
3 ever disposed of any waste at the U.S. Scrap site?

4 A Yes, they did.

5 Q Do you recall whether Chicago Rotoprint
6 ever disposed of any waste at the 9th Avenue Dump
7 site?

8 A Yes, they did.

9 Q Do you recall the location of the
10 facility which disposed of wastes at those sites?

11 A 4601 West Belmont Avenue, Chicago,
12 Illinois.

13 Q And do you recall the time period over
14 which it disposed of those wastes?

15 A 1970 until 1975.

16 Q Do you recall the type of waste disposed?

17 A I believe it was ink, dirty solvents and
18 oils in drums.

19 Q Do you recall the volume of wastes
20 disposed over that time period?

21 A Not at this time.

22 Q Do you recall whether Commercial Solvents
23 ever disposed of any waste at the U.S. Scrap site?

24 A Yes, they did.

1 Q Do you recall whether Commercial Solvents
2 ever disposed of any waste at the 9th Avenue Dump
3 site?

4 A Yes, they did.

5 Q Do you recall whether Commercial Solvents
6 is affiliated with any other company?

7 A I believe it's affiliated with McWhorter
8 Chemical Company.

9 Q And do you recall the location of the
10 facility which disposed of waste at the two sites?

11 A I believe it would be Cottage Avenue,
12 Carpentersville, Illinois.

13 Q Do you recall the time period over which
14 it disposed of those wastes?

15 A 1973 until 1975.

16 Q Do you recall the type of waste disposed?

17 A I believe it was dirty solvents.

18 Q Do you recall the volume disposed over
19 that time period?

20 A Not at this time.

21 Q Do you recall whether Continental
22 Cleaning ever disposed of any waste at the U.S.
23 scrap site?

24 A Not at this time.

1 Q Do you recall whether Continental
2 Cleaning ever disposed of any waste at the 9th
3 Avenue Dump site?

4 A Not at this time.

5 Q Do you recall whether Contour Saws ever
6 disposed of any waste at the U.S. Scrap site?

7 A I am not sure.

8 Q Do you recall whether Contour Saws ever
9 disposed of any waste at the 9th Avenue Dump site?

10 A Yes, they did.

11 Q Do you recall if Contour Saws is
12 affiliated with any other company?

13 A I believe they are a division of the
14 Do-All Company.

15 Q Do you recall the location of the
16 facility which disposed of waste at the 9th Avenue
17 Dump site?

18 A I believe it was 1217 Thacker Street, Des
19 Plaines, Illinois.

20 Q Do you recall the time period over which
21 it disposed of those wastes?

22 A 1974 until 1975.

23 Q Do you recall the type of waste disposed?

24 A I am not sure at this time.

1 Q Do you recall if it was liquid waste?

2 A No, I am not sure what it was at all at
3 this time or even if it was drums or if it was a
4 vacuum tanker load.

5 Q Do you recall the volume of waste?

6 A No, I don't.

7 Q Do you recall whether Cook County
8 Hospital ever disposed of any waste at the U.S.
9 Scrap site?

10 A Yes, they did.

11 Q Do you recall whether Cook County
12 Hospital ever disposed of any waste at the 9th
13 Avenue Dump site?

14 A I am not sure if they did or not at the
15 9th Avenue Dump site.

16 Q Do you recall the location of the
17 facility which disposed of waste at the U.S. Scrap
18 site?

19 A West Harrison Street in Chicago,
20 Illinois.

21 Q Do you recall the period of time over
22 which it disposed of waste at that site?

23 A It was some time in 1973.

24 Q Do you recall the type of waste that was

1 disposed?

2 A If my recollection is right, it was some
3 kind of laboratory samples.

4 Q Do you recall more specifically what was
5 in the samples?

6 A No, I have no idea at all.

7 Q Do you recall if it consisted of liquids?

8 A Oh, yeah, it was liquids.

9 Q Do you recall the volume of lab samples
10 that were disposed at the U.S. Scrap site?

11 A No, only that it was a small load. It
12 was a type of load that could go into a pickup
13 truck or something like that.

14 Q Do you recall whether Croname ever
15 disposed of any waste at the U.S. Scrap site?

16 A Yes, they did.

17 Q Do you recall whether Croname ever
18 disposed of any waste at the 9th Avenue Dump site?

19 A Yes, they did.

20 Q Do you recall the location of the
21 facility which disposed of waste at those sites?

22 A 2055 Ruby in Melrose Park, Illinois.

23 Q Do you recall the period of time over
24 which it disposed of those wastes?

1 A 1972 until 1975.

2 Q Do you recall the type of waste?

3 A Some sort of acid waste.

4 Q And do you recall the volume of waste
5 disposed over that time period?

6 A 3,000-gallon tanker load, one to two
7 times per month.

8 Q Do you recall whether Cullgan Fire
9 Protection ever disposed of any waste at the U.S.
10 Scrap site?

11 A Not at this time.

12 Q Do you recall whether Cullgan Fire
13 Protection ever disposed of any waste at the 9th
14 Avenue Dump site?

15 A Not at this time.

16 Q Do you recall whether Cuneo Solvents ever
17 disposed of any waste at the U.S. Scrap site?

18 A Not at this time.

19 Q Do you recall whether Cuneo Solvents ever
20 disposed of any waste at the 9th Avenue Dump site?

21 A Not at this time.

22 Q Do you recall whether Custom Metals ever
23 disposed of any waste at the U.S. Scrap site?

24 A Not at this time.

1 Q Do you recall whether Custom Metals ever
2 disposed of any waste at the 9th Avenue Dump site?

3 A Not at this time.

4 Q Do you recall whether Delaware Plastics
5 ever disposed of any waste at the U.S. Scrap site?

6 A Not at this time.

7 Q Do you recall whether Delaware Plastics
8 ever disposed of any waste at the 9th Avenue Dump
9 site?

10 A Not at this time.

11 Q Do you recall whether Desa Industries
12 ever disposed of any waste at the U.S. Scrap site?

13 A Yes, they did.

14 Q Do you recall whether Desa Industries
15 ever disposed of any waste at the 9th Avenue Dump
16 site?

17 A Yes, they did.

18 Q Do you recall the location of the
19 facility which disposed of waste at those two
20 sites?

21 A 15000 South Western Avenue, Park Forest,
22 Illinois.

23 Q Do you recall the time period over which
24 it disposed those wastes?

1 A I believe it was 1972 until 1975.

2 Q Do you recall the type of waste disposed?

3 A I think it was gasoline and oil.

4 Q Do you recall the volume disposed over
5 that time period?

6 A Not at this time.

7 Q Do you recall whether Dublin Company ever
8 disposed of any waste at the U.S. Scrap site?

9 A No, I don't think they did.

10 Q Do you recall whether Dublin Company ever
11 disposed of any waste at the 9th Avenue Dump site?

12 A Yes, I believe they did.

13 Q Do you recall the location of the
14 facility which disposed of those wastes?

15 A 1919 Stanley Street, Northbrook,
16 Illinois.

17 Q Do you recall the time period over which
18 those wastes were disposed?

19 A I believe it was 1974 until 1975.

20 Q Do you recall the type of waste disposed?

21 A No, I don't know at this time. I am not
22 sure.

23 Q Do you recall the volume of waste
24 disposed over that time period?

1 A No, I am not sure at this time.

2 Q Do you recall whether Dutone ever
3 disposed of any waste at the U.S. Scrap site?

4 A Not at this time.

5 Q Do you recall whether Dutone ever
6 disposed of any waste at the 9th Avenue Dump site?

7 A Not at this time.

8 Q Do you recall whether Elgin Machine ever
9 disposed of any waste at the U.S. Scrap site?

10 A I am not sure at this time.

11 Q Do you recall whether Elgin Machine ever
12 disposed of any waste at the 9th Avenue Dump site?

13 A In my original statement I says, "I
14 didn't remember," but since then and going through
15 the records, I found that there was some disposal
16 at the 9th Avenue site, yes.

17 Q Do you recall the location of the
18 facility which disposed of those wastes at the 9th
19 Avenue Dump?

20 A 412 North State Street, Elgin, Illinois.

21 Q Do you recall the period of time over
22 which those wastes were disposed?

23 A 1973 and possibly 1974.

24 Q Do you recall the type of waste disposed?

1 A Not -- I don't know for sure, but it was
2 in drums.

3 Q Do you recall the volume of wastes
4 disposed over that time period?

5 A Not at this time.

6 Q Do you recall whether Federal Tool &
7 Plastics ever disposed of any waste at the U.S.
8 Scrap site?

9 A Yes, they did.

10 Q Do you recall whether Federal Tool &
11 Plastics ever disposed of any waste at the 9th
12 Avenue Dump site?

13 A I believe they did.

14 Q Do you know if they are affiliated with
15 any other company?

16 A I believe the correct name is Federal
17 Tool & Plastics Division U.C.A. Corporation.

18 Q Do you recall the location of the
19 facility which disposed of wastes at the 9th
20 Avenue Dump site and U.S. Scrap site?

21 A 600 West Pratt Boulevard, Lincolnwood,
22 Illinois.

23 Q Do you recall the time period over which
24 those wastes were disposed?

1 A I believe 1973 and possibly 1974.

2 Q Do you recall the type of waste?

3 A Not at this time.

4 Q Do you recall the volume of waste
5 disposed over that time period?

6 A Not at this time.

7 Q Do you recall whether Ford Motor Company
8 ever disposed of any waste at the U.S. Scrap site?

9 A I don't remember at this time.

10 Q Do you recall whether Ford Motor Company
11 ever disposed of any waste at the 9th Avenue Dump
12 site?

13 A I don't remember at this time.

14 Q Do you recall whether Frank J. Curran
15 Company ever disposed of any waste at the U.S.
16 Scrap site?

17 A Not at this time.

18 Q Do you recall whether Frank J. Curran
19 Company ever disposed of any waste at the 9th
20 Avenue Dump site?

21 A Not at this time.

22 Q Do you recall whether Gard Industries
23 ever disposed of any waste at the U.S. Scrap site?

24 A Yes, they did.

1 Q Do you recall whether Gard Industries
2 ever disposed of any waste at the 9th Avenue Dump
3 site?

4 A I believe they did.

5 Q Do you recall the location of the
6 facility which disposed of those wastes?

7 A 746 West Algonquin Road, Arlington
8 Heights, Illinois.

9 Q Do you recall the time period over which
10 it disposed waste at the two sites?

11 A I believe 1973 and possibly 1974.

12 Q Do you recall the type of waste disposed
13 at the sites?

14 A Not at this time.

15 Q Do you recall the volume of waste
16 disposed?

17 A Not at this time.

18 Q Do you recall whether Handschy Chemical
19 ever disposed of any waste at the U.S. Scrap site?

20 MS. TIGHE: Off the record.

21 (Discussion held off the record.)

22 MR. KOWALSKI: Back on.

23 BY MR. KOWALSKI:

24 Q Mr. Martell, you indicated that you

1 recall some additional information on Federal Tool
2 & Plastics, is that correct?

3 A Yes. In looking at the original
4 transcript here where I answered on that, I see I
5 wrote in and from the research in the Illinois
6 Manufacturers Directory that it says the parent
7 company is NIBUT Corporation, 3600 West Pratt
8 Boulevard, Lincolnwood, Illinois, which is the
9 same location as Federal Tool shows.

10 Q Okay. Going now to Handschy Chemical.
11 Do you recall whether it ever disposed of any
12 waste at the U.S. Scrap site?

13 A Yes, they did.

14 Q Do you recall whether it disposed of any
15 waste at the 9th Avenue Dump site?

16 A I don't think they did.

17 Q Do you recall the location of the
18 facility which disposed of waste at the U.S. Scrap
19 site?

20 A I believe it was 2525 North Elston
21 Avenue, Chicago, Illinois.

22 Q Do you recall the time period over which
23 it disposed of waste at the U.S. Scrap site?

24 A I think it was 1969 to 1970.

1 Q Do you recall the type of waste disposed
2 at that site?

3 A Not at this time.

4 Q Do you recall the volume of waste
5 disposed over that time period?

6 A Not at this time. The only thing I think
7 I do know is that it was drums.

8 Q Do you recall whether Hausner Hard Chrome
9 ever disposed of any waste at the U.S. Scrap site?

10 A Not at this time.

11 Q Do you recall whether Hausner Hard Chrome
12 ever disposed of any waste at the 9th Avenue Dump
13 site?

14 A Not at this time.

15 MR. KOWALSKI: Off the record.

16 (Discussion held off the record.)

17 BY MR. KOWALSKI: Back on.

18 Q Mr. Martell, did you want to go back
19 regarding Hausner Hard Chrome?

20 A Okay.

21 Q After reviewing your notes on your
22 statement again, is your recollection refreshed
23 whether Hausner Hard Chrome disposed of any waste
24 at the U.S. Scrap site?

1 A Possibly.

2 Q Do you recall whether Hausner Hard Chrome
3 disposed of any waste at the 9th Avenue Dump site?

4 A It could have went there, too.

5 Q Do you recall the location of the
6 facility which would have disposed of that waste?

7 A Not at this time.

8 Q Do you recall the time period over which
9 waste went to one or both of those sites?

10 A 1973 and possibly 1974.

11 Q Do you recall the type of waste?

12 A Chrome acid waste in drums.

13 Q Do you recall the volume of waste
14 disposed?

15 A Not at this time.

16 Q Do you recall whether Heat Bath
17 Corporation disposed of any waste at the U.S.
18 Scrap site?

19 A Yes, they did.

20 Q Do you recall whether Heat Bath
21 Corporation disposed of any waste at the 9th
22 Avenue Dump site?

23 A Yes, they did.

24 Q Do you recall the location of the

1 facility which disposed of those wastes?

2 A 4025 South Princeton Avenue, Chicago,
3 Illinois.

4 Q Do you recall the time period over which
5 those wastes were disposed?

6 A 1973 to 1974.

7 Q Do you recall the type of waste disposed
8 at the two sites?

9 A I am not sure at this time.

10 Q Do you recall the volume of waste that
11 would have went to those sites?

12 A I am not sure at this time.

13 Q Do you recall whether Hooker Glass
14 disposed of any waste at the U.S. Scrap site?

15 A Yes, they did.

16 Q Do you recall whether Hooker Glass
17 disposed of any waste at the 9th Avenue Dump site?

18 A I don't think so.

19 Q Do you recall the location of the
20 facility which disposed of wastes at the U.S.
21 Scrap site?

22 A East Washington Boulevard -- wait a
23 minute, that ain't even right. The Dan Ryan
24 expressway and Washington Boulevard, on the east

1 side of the expressway and the south side of
2 Washington Boulevard. The building would almost
3 be adjacent to the expressway.

4 Q Do you recall the period time over which
5 Hooker disposed of waste at the U.S. Scrap site?

6 A 1970 to 1971.

7 Q And do you recall the type of waste
8 disposed at that site?

9 A Paints and dirty solvents.

10 Q And do you recall the volume of waste
11 disposed of at the site?

12 A 30 to 50 drums, two to three times per
13 year. And I was there myself at that site, at
14 that factory.

15 Q Do you recall whether I.M.F. Incorporated
16 ever disposed of any waste at the U.S. Scrap site?

17 A Not at this time.

18 Q Do you recall whether I.M.F. Incorporated
19 ever disposed of any waste at the 9th Avenue Dump
20 site?

21 A Not at this time.

22 Q Do you recall whether Inland Steel
23 Company ever disposed of any waste at the U.S.
24 Scrap site?

1 A Not at this time.

2 Q Do you recall whether Inland Steel
3 Company ever disposed of any waste at the 9th
4 Avenue Dump site?

5 A Not at this time.

6 Q Do you recall whether Intaglio Service
7 ever disposed of any waste at the U.S. Scrap site?

8 A Yes, they did.

9 Q Do you recall whether Intaglio Service
10 ever disposed of any waste at the 9th Avenue Dump
11 site?

12 A Yes, they did.

13 Q Do you recall the location of the
14 facility which disposed of wastes at those sites?

15 A Tower Drive, Burr Ridge, Illinois.

16 Q Do you recall the period of time over
17 which it disposed of those wastes?

18 A Approximately 1973 until 1975.

19 Q Do you recall the type of waste disposed
20 at those sites?

21 A I am not sure at this time.

22 Q Do you recall the volume of waste
23 disposed at the sites?

24 A I am not sure at this time.

1 Q Do you recall whether J&S Tin Mill
2 Products ever disposed of any waste at the U.S.
3 Scrap site?

4 A Yes, they did.

5 Q Do you recall whether J&S Tin Mill
6 Products ever disposed of any waste at the 9th
7 Avenue Dump site?

8 A Possibly.

9 Q Do you recall the location of the
10 facility from which J&S Tin Mill Products disposed
11 of those wastes?

12 A 3400 North Powell Avenue, Franklin Park,
13 Illinois.

14 Q Do you recall the time period over which
15 J&S disposed of those wastes?

16 A For sure '73 and maybe into '74.

17 Q Do you recall the type of waste disposed?

18 A I am not sure at this time.

19 Q Do you recall the volume of waste
20 disposed?

21 A I am not sure at this time.

22 Q Do you recall whether John L. Armitage
23 ever disposed of any waste at the U.S. Scrap site?

24 A Not at this time.

1 Q Do you recall whether John L. Armitage
2 ever disposed of any waste at the 9th Avenue Dump
3 site?

4 A Not at this time.

5 MS. TIGHE: Off the record.

6 (Discussion held off the record.)

7 MR. KOWALSKI: Back on. Can you please read
8 back the last question and answer?

9 (Record read.)

10 BY MR. KOWALSKI:

11 Q Mr. Martell, going back to your answer to
12 the John L. Armitage Company, would you like to
13 change your response to those questions?

14 A Yes. After looking at Page 211 on my
15 original statement and the notes I made in the red
16 pencil there, I see I did find one load for sure
17 which occurred on August 15, 1973. So, for sure
18 this makes it 9th Avenue. It would have been
19 dumped at 9th Avenue and --

20 Q So, you recall waste going from John L.
21 Armitage to the 9th Avenue Dump site?

22 A Yes, I do.

23 Q Do you recall whether any waste from the
24 John L. Armitage waste went to the U.S. Scrap

1 site?

2 A It's possible.

3 Q Do you recall the location of the
4 facility which disposed of that waste?

5 A 1313 Lunt Avenue, Elk Grove Village,
6 Illinois.

7 Q Do you recall the time period during
8 which that waste was disposed?

9 A Some time in the latter part of 1973 and
10 possibly 1974.

11 Q Do you recall the type of waste disposed?

12 A Drums of paint, coatings and solvents.

13 Q And do you recall the volume of waste
14 disposed?

15 A Not at this time.

16 Q Do you recall whether Kerr Chemical ever
17 disposed of any waste at the U.S. Scrap site?

18 A Yes, they did.

19 Q Do you recall whether Kerr Chemical ever
20 disposed of any waste at the 9th Avenue Dump site?

21 Q No, I don't think they did.

22 Q Do you recall the location of the
23 facility which disposed of waste at the U.S. Scrap
24 site?

1 A 1001 Northwest Highway, Des Plaines,
2 Illinois.

3 Q Do you recall the time period over which
4 it disposed of those wastes?

5 A 1969 and 1970.

6 Q Do you recall the type of waste disposed?

7 A Not at this time.

8 Q Do you recall the volume of waste
9 disposed?

10 A Not at this time.

11 Q Do you recall whether KMS Industries ever
12 disposed of any waste at the U.S. Scrap site?

13 A Yes, they did.

14 Q Do you recall whether KMS Industries ever
15 disposed of any waste at the 9th Avenue Dump site?

16 A Yes, they did.

17 Q Do you recall if they are affiliated with
18 any other company?

19 A I believe the correct way the name is
20 said is Microwave Cavity Laboratories, Division of
21 KMS Industries, Incorporated.

22 Q Do you recall the location of the
23 facility which disposed of waste at those sites?

24 A It's 10 North Beach Avenue, LaGrange,

1 Illinois.

2 Q Do you recall the time period over which
3 those wastes were disposed?

4 A 1973, 1974.

5 Q Do you recall the type of waste disposed
6 at the sites?

7 A Not at this time.

8 Q Do you recall whether -- strike that.

9 Do you recall the volume of waste
10 disposed of at the two sites?

11 A Not at this time.

12 Q Do you recall whether Liquid Dynamics
13 ever disposed of any waste at the U.S. Scrap site?

14 A Not at this time.

15 Q Do you recall whether Liquid Dynamics
16 ever disposed of any waste at the 9th Avenue Dump
17 site?

18 A Not at this time.

19 Q Do you recall whether Liquid Waste
20 Incorporated ever disposed of any waste at the
21 U.S. Scrap site?

22 A No, they didn't.

23 Q Do you recall whether Liquid Waste
24 Incorporated ever disposed of any waste at the 9th

1 Avenue Dump site?

2 A No, they didn't.

3 Q Do you recall whether Lisner ever
4 disposed of any waste at the U.S. Scrap site?

5 MR. KOWALSKI: Off the record.

6 (Discussion held off the record.)

7 MR. KOWALSKI: Can you please read back the
8 last question.

9 (Record read.)

10 BY THE WITNESS:

11 A I recall hauling some dry waste such as
12 paper bails -- or bails of paper from Lisner
13 facility, but I believe it was before the U.S.
14 Scrap site existed and the 9th Avenue site
15 existed.

16 BY MR. KOWALSKI:

17 Q Okay. So, you don't believe their waste
18 went to either of the two sites?

19 A No, I don't.

20 Q Do you recall the location of the
21 facility from which you hauled that waste?

22 A I believe it's 1000 North Branch Street
23 or Cherry Street, one of those two, on Goose
24 Island which is in Chicago, Illinois.

1 Q Do you recall whether Luminous Ceiling
2 ever disposed of any waste at the U.S. Scrap site?

3 A Yes, they did.

4 Q Do you recall whether Luminous Ceiling
5 ever disposed of any waste at the 9th Avenue Dump
6 site?

7 A Yes, they did.

8 Q Do you recall the location of the
9 facility from which it disposed of those wastes?

10 A 6420 Chestnut Street, Morton Grove,
11 Illinois.

12 Q Do you recall the time period over which
13 it disposed of those wastes?

14 A 1973 until 1975.

15 Q Do you recall the type of waste disposed?

16 A Paints and solvents.

17 Q Do you recall the volume of waste
18 disposed at those sites?

19 A Not at this time.

20 Q Do you recall whether Mass & Waldstein
21 ever disposed of any waste at the U.S. Scrap site?

22 A Yes, they did.

23 Q Do you recall whether Mass & Waldstein
24 ever disposed of any waste at the 9th Avenue Dump

1 site?

2 A Yes, they did.

3 Q Do you recall the location of the
4 facility which disposed of those wastes?

5 A 1658 West Carol Avenue, Chicago,
6 Illinois.

7 Q Do you recall the time period over which
8 it disposed of those wastes?

9 A 1973, 1974.

10 Q Do you recall the type of waste disposed
11 over that time period?

12 A Paints and dirty solvents.

13 Q And do you recall the volume of waste
14 disposed over that time period?

15 A Not at this time.

16 Q Do you recall whether Marvel Metal ever
17 disposed of any waste at the U.S. Scrap site?

18 A Not at this time.

19 Q Do you recall whether Marvel Metal ever
20 disposed of any waste at the 9th Avenue Dump site?

21 A Not at this time.

22 Q Do you recall whether Metal Industry ever
23 disposed of any waste at the U.S. Scrap site?

24 A Not at this time.

1 Q Do you recall whether Metal Industry ever
2 disposed of any waste at the 9th Avenue Dump site?

3 A Not at this time.

4 Q Do you recall whether Metal Reclaiming
5 Corporation ever disposed of any waste at the U.S.
6 Scrap site?

7 A Not at this time.

8 Q Do you recall whether Metal Reclaiming
9 Corporation ever disposed of any waste at the 9th
10 Avenue Dump site?

11 A Not at this time.

12 Q Do you recall whether Midwest Electronics
13 ever disposed of any waste at the U.S. Scrap site?

14 A Yes, they did.

15 Q Do you recall whether Midwest Electronics
16 ever disposed of any waste at the 9th Avenue Dump
17 site?

18 A Yes, they did.

19 Q Do you recall the location of the
20 facility which disposed of those wastes?

21 A 1639 West Walnut Street, Chicago,
22 Illinois.

23 Q Do you recall the time period over which
24 it disposed of those wastes?

1 A 1973 to 1975.

2 Q Do you recall the type of waste?

3 A Varnish, oil and dirty solvents.

4 Q Do you recall the volume of waste
5 disposed over that time period?

6 A Not at this time.

7 Q Do you recall whether Mirror Reflector
8 Service Company ever disposed of any waste at the
9 U.S. Scrap site?

10 A Yes, they did.

11 Q Do you recall whether Mirror Reflector
12 Service Company ever disposed of any waste at the
13 9th Avenue Dump site?

14 A I believe they did.

15 Q Do you recall the location of the
16 facility which disposed of those wastes?

17 A Not at this time.

18 Q Do you recall the time period over which
19 those wastes were disposed at the two sites?

20 A I believe it was in '73 and possibly '74.

21 Q Do you recall the type of waste disposed?

22 A Drum -- it was in drums and there were
23 some kind of chemicals, but I don't know what
24 kind.

1 Q Do you recall the volume of waste
2 disposed over that time period?

3 A Not at this time.

4 Q Do you recall --

5 MS. TIGHE: Ed, can we take a break?

6 MR. KOWALSKI: Sure.

7

8 (Whereupon, a short break was had

9 after which the preceding

10 deposition

11 continued as follows:)

12 BY MR. KOWALSKI:

13 Q Mr. Martell, do you recall whether Mobil

14 Oil disposed of any waste at the U.S. Scrap site?

15 A Yes, they did.

16 Q Do you recall whether they disposed of

17 any waste at the 9th Avenue Dump site?

18 A Yes, they did.

19 Q Do you recall the location of the

20 facility which disposed of those wastes?

21 A Well, there were two facilities. One of

22 them was the so-called grease plant, which was at

23 3800 South Cicero in Cicero, Illinois. The other

24 one is the Mobil Refinery at I-55 and the Des

1 Plaines River in Joliet, Illinois.

2 Q And do you recall the time period over
3 which the Cicero facility disposed of waste at the
4 two sites?

5 A I believe 1972 until 1975.

6 Q And do you recall the type of waste it
7 disposed at those sites?

8 A Grease in drums.

9 Q Do you recall the volume of waste
10 disposed by that particular facility at the two
11 sites?

12 A Approximately 20 to 40 drums every two to
13 four months.

14 Q Do you recall the time period over which
15 the Joliet facility disposed of waste at the two
16 sites?

17 A I believe it would be like 1973 until
18 1975.

19 Q Do you recall the type of waste it
20 disposed at the two sites?

21 A I believe that was, like, oil.

22 Q And do you recall the volume of waste it
23 would have disposed at the two sites?

24 A Not exactly. I was at the refinery --

1 are we talking about the refinery?

2 Q Yes.

3 A I was at the refinery with Dave Head a
4 couple of times for sure, and we looked at that
5 particular job and a couple of other jobs like the
6 cooling towers and that. I remember that very
7 distinctly. But I am a little hazy on the volume
8 of the material that was taken -- the waste
9 material that was taken from the refinery. LeRoy
10 Brown, one of the drivers, claims it was a very
11 large stop and that we had hauled out as much as
12 two or three loads a week, but I don't remember
13 the volume.

14 Q Okay. Do you recall whether Modine
15 Manufacturing Company disposed of any waste at the
16 U.S. Scrap site?

17 A Yes, they did.

18 Q Do you recall whether Modine
19 Manufacturing Company disposed of any waste at the
20 9th Avenue Dump site?

21 A Yes, they did.

22 Q Do you recall the location of the
23 facility from which those wastes were disposed?

24 A Ringwood Road and that's McHenry Post

1 office. That's all I have.

2 Q Do you recall the period of time over
3 which it disposed of waste at those sites?

4 A 1973 to 1974.

5 Q Do you recall the type of waste disposed?

6 A I don't know at this time.

7 Q Do you recall the volume of waste
8 disposed over that time period?

9 A No, I can't remember at this time.

10 Q Do you recall whether Moffet Tech Center
11 disposed of any waste at the U.S. Scrap site?

12 A No, I just can't remember. No.

13 Q Do you recall whether Moffet Tech Center
14 disposed of any waste at the 9th Avenue Dump site?

15 A Not at this time.

16 Q Do you recall whether National Bronze
17 disposed of any waste at the U.S. Scrap site?

18 A Yes, they did.

19 Q Do you recall whether National Bronze
20 disposed of any waste at the 9th Avenue Dump site?

21 A Yes, they did.

22 Q Do you recall the location of the
23 facility which disposed of those wastes?

24 A 9945 Franklin, Franklin Park, Illinois.

1 Q Do you recall the time period over which
2 those wastes were disposed?

3 A 1973 until 1975.

4 Q Do you recall the type of wastes
5 disposed?

6 A I believe it was acid waste of some type.

7 Q Do you recall the volume of waste
8 disposed?

9 A Not at this time.

10 Q Do you recall whether National Cellofilm
11 ever disposed of any waste at the U.S. Scrap site?

12 A Not at this time.

13 Q Do you recall whether Cellofilm disposed
14 of any waste at the 9th Avenue Dump site?

15 A Not at this time.

16 Q Do you recall whether Northwest Salvage
17 ever disposed of any waste at the U.S. Scrap site?

18 A Yes, they did.

19 Q Do you recall whether Northwest Salvage
20 ever disposed of any waste at the 9th Avenue Dump
21 site?

22 A No, I don't think they did.

23 Q Do you recall the location of the
24 facility which disposed of waste at the U.S. Scrap

1 site?

2 A The approximate area is about a block
3 north of Addison Street and a little bit west of
4 Pulaski Road in Chicago, Illinois.

5 Q Do you recall the time period over which
6 it disposed of those wastes?

7 A 1966 until approximately 1969.

8 Q Do you recall the type of waste disposed?

9 A It was dry waste, nonliquid.

10 Q Do you recall the volume of waste
11 disposed over that time period?

12 A Not at this time.

13 Q Do you recall whether Northwest Screen
14 Print ever disposed of any waste at the U.S. Scrap
15 site?

16 A Yes, they did.

17 Q Do you recall whether Northwest Screen
18 Print ever disposed of any waste at the 9th Avenue
19 Dump site?

20 A Yes, they did.

21 Q Do you recall the location of the
22 facility which disposed of those wastes?

23 A Not at this time.

24 Q Do you recall the time period over which

1 that waste was disposed at the sites?

2 A 1973 and possibly 1974.

3 Q Do you recall the type of waste disposed?

4 A I believe it's inks and dirty solvents.

5 Q Do you recall the volume of waste

6 disposed at the sites?

7 A Not at this time.

8 Q Do you recall whether Northwestern

9 University ever disposed of any waste at the U.S.

10 Scrap site?

11 A Yes, they did.

12 Q Do you recall whether Northwestern

13 University ever disposed of any waste at the 9th

14 Avenue Dump site?

15 A I am not sure.

16 Q Do you recall the location of the

17 facility which disposed of those wastes?

18 A It's -- I believe it's their university

19 in Evanston, Illinois.

20 Q Do you recall the time period over which

21 those wastes were disposed?

22 A 1973, some time.

23 Q Do you recall the type of wastes

24 disposed?

1 A I believe it was laboratory samples.

2 Q Do you recall the volume of waste
3 disposed at the site?

4 A No, only that it was probably a small
5 load.

6 Q Do you recall what was in the laboratory
7 samples?

8 A No, I don't.

9 Q Do you recall whether Owens-Illinois ever
10 disposed of any waste at the U.S. Scrap site?

11 A I'm not sure.

12 Q Do you recall whether Owens-Illinois ever
13 disposed of any waste at the 9th Avenue Dump site?

14 A I believe they did.

15 Q Do you recall the location of the
16 facility which disposed of those wastes?

17 A 440 East 138th Street in Chicago,
18 Illinois.

19 Q Mr. Martell, did you ever go to that
20 facility yourself?

21 A Yes, I did. I was there for -- on this
22 particular job. This was a vacuum tanker. I am
23 not sure about the Vac All but for sure it was a
24 vacuum tanker job, and we were there because it

1 wasn't that far from our place at U.S. Scrap site.

2 Q So, you are certain of the location of
3 the facility?

4 A Yes, I am.

5 Q Do you know for sure whether that
6 facility was owned by Owens-Illinois or
7 Owens-Corning Corporation?

8 A No, I am not sure at this time.

9 Q Do you recall the time period over which
10 Owens-Illinois or Owens-Corning disposed of waste
11 at the 9th Avenue Dump site?

12 A It was either '73 or '74.

13 Q Do you recall the type of waste it
14 disposed?

15 A No, I don't recall.

16 Q Do you recall the volume of waste
17 disposed at the site?

18 A I believe it was one 4,000-gallon or
19 5,000-gallon tanker load.

20 Q Do you recall whether Paisley Products
21 disposed of any waste at the U.S. Scrap site?

22 A Yes, they did.

23 Q Do you recall whether Paisley Products
24 ever disposed of any waste at the 9th Avenue Dump

1 site?

2 A No, they didn't.

3 Q Do you recall the location of the
4 facility which disposed of waste at the U.S. Scrap
5 site?

6 A 17th and Canal Street, Chicago, Illinois.

7 Q And do you recall the period of time over
8 which it disposed of those wastes?

9 A Approximately 1969 and 1970.

10 Q Do you recall the type of waste disposed?

11 A Adhesives in drums.

12 Q Do you recall the volume of wastes
13 disposed over that time period?

14 A Not at this time.

15 Q Do you recall whether Penray ever
16 disposed of any waste at the U.S. Scrap site?

17 A Yes, they did.

18 Q Do you recall whether Penray ever
19 disposed of any waste at the 9th Avenue Dump site?

20 A No, I don't think so.

21 Q Do you recall whether Penray ever
22 disposed of any waste -- strike that.

23 Do you recall the location of the
24 facility from which Penray disposed those wastes?

1 A 1801 Estes Avenue, Elk Grove Village,
2 Illinois.

3 Q Do you recall the time period over which
4 Penray disposed of waste at the U.S. Scrap site?

5 A I believe it was 1969 to 1971.

6 Q Do you recall the type of waste disposed?

7 A Some type of chemical.

8 Q Do you recall the volume of waste
9 disposed over that time period?

10 A 50 to 60 drums once a year.

11 Q Do you recall whether Poncher Industries
12 ever disposed of any waste at the U.S. Scrap site?

13 MR. KOWALSKI: Off the record.

14 (Discussion held off the record.)

15 BY MR. KOWALSKI:

16 Q Okay. Mr. Martell, I had asked whether
17 you recall whether Poncher Industries ever
18 disposed of any waste at the U.S. Scrap site?

19 A Yes, they did.

20 Q Do you recall whether Poncher Industries
21 ever disposed of any waste at the 9th Avenue Dump
22 site?

23 A Yes, they did.

24 Q Do you recall the location of the

1 facility which disposed of those wastes?

2 A Not at this time.

3 Q Do you recall the period of time over
4 which it disposed of those wastes?

5 A '73 and '74.

6 Q Do you recall the type of waste disposed?

7 A Not at this time.

8 Q Do you recall the volume of waste
9 disposed over that time period?

10 A Not at this time.

11 Q Do you recall whether Preheler Electrical
12 ever disposed of any waste at the U.S. Scrap site?

13 A Yes, they did.

14 Q Do you recall whether Preheler Electrical
15 ever disposed of any waste at the 9th Avenue Dump
16 site?

17 A Yes, they did.

18 Q Do you recall the location of the
19 facility which disposed of those wastes?

20 A 2300 North Kilbourn Avenue, Chicago,
21 Illinois.

22 Q Do you recall the period of time over
23 which it disposed of those wastes?

24 A 1973 until 1975.

1 Q Do you recall the type of waste disposed
2 at those sites?

3 A Paints, solvents, varnishes and oils.

4 Q Do you recall the volume of waste
5 disposed at those sites?

6 A Not at this time.

7 Q Do you recall what -- do you recall
8 whether National Precision Circuits ever disposed
9 of any waste at the U.S. Scrap site?

10 A I don't think so.

11 Q Do you recall whether National Precision
12 Circuits ever disposed of any waste at the 9th
13 Avenue Dump site?

14 A Yes, they did.

15 Q Do you recall the location of the
16 facility which disposed of those wastes?

17 A 5760 West Grand Avenue, Chicago,
18 Illinois.

19 Q Do you recall the period of time over
20 which it disposed of those wastes?

21 A 1975.

22 Q Do you recall the type of waste it
23 disposed?

24 A I believe it was acid in drums.

1 Q Do you recall the volume of waste
2 disposed over that time period?

3 A Not at this time.

4 Q Do you recall whether Reliable
5 Engineering ever disposed of any waste at the U.S.
6 Scrap site?

7 A Yes, they did.

8 Q Do you recall whether Reliable
9 Engineering ever disposed of any waste at the 9th
10 Avenue Dump site?

11 A Yes, they did.

12 Q Do you recall whether Reliable
13 Engineering is associated or affiliated with any
14 other company?

15 A Not at this time.

16 Q Do you recall the location of the
17 facility which disposed of waste at those sites?

18 A I don't know the exact address, but I
19 believe it's in Chicago, Illinois.

20 Q Do you recall the period of time over
21 which it disposed of those wastes?

22 A 1972 until 1974.

23 Q Do you recall the type of waste it
24 disposed of at those sites?

1 A Paints and dirty solvents.

2 Q Do you recall the volume of waste
3 disposed over that period of time?

4 A I am not sure at this time.

5 Q Do you recall whether Reliance Universal
6 ever disposed of any waste at the U.S. Scrap site?

7 A I don't believe so.

8 Q Do you recall whether Reliance Universal
9 ever disposed of any waste at the 9th Avenue Dump
10 site?

11 A Yes, they did.

12 Q Do you recall the location of the
13 facility which disposed of those wastes?

14 A 1915 Industrial Avenue, Zion, Illinois.

15 Q Do you recall the time period over which
16 it disposed of those wastes?

17 A 1975.

18 Q Do you recall the type of waste disposed
19 at the 9th Avenue Dump site?

20 A Paints, dirty solvents and varnish.

21 Q Do you recall the volume of waste
22 disposed over that time period?

23 A Not at this time.

24 Q Do you recall whether Rockola

1 Manufacturing ever disposed of any waste at the
2 U S. Scrap site?

3 A Yes, they did.

4 Q Do you recall whether Rockola
5 Manufacturing ever disposed of any waste at the
6 9th Avenue Dump site?

7 A Yes, they did.

8 Q Do you recall the location of the
9 facility which disposed of those wastes?

10 A 313 South Rohling Avenue, I guess it is,
11 and it's Addison, Illinois.

12 Q Do you recall the time period over which
13 those wastes were disposed?

14 A Approximately 1972 until 1975.

15 Q Do you recall the type of waste disposed?

16 A Paints and dirty solvents.

17 Q Do you recall the volume of waste
18 disposed at those sites?

19 A Not at this time.

20 Q Do you recall whether Rohm & Hass ever
21 disposed of any waste at the U.S. Scrap site?

22 A Yes, they did.

23 Q Do you recall whether Rohm & Hass ever
24 disposed of any waste at the 9th Avenue Dump site?

1 A Yes, they did.

2 Q Do you recall the location of the
3 facility which disposed of those wastes?

4 A I believe -- according to the Illinois
5 Manufacturer's Directory, the address is listed as
6 three quarter mile east Whitehall, Illinois.

7 Q Do you recall that facility being located
8 near any other major city?

9 A Oh, it's near St. Louis.

10 Q Do you recall the time period over which
11 Rohm & Hass disposed of waste at the U.S. Scrap
12 site?

13 A About 1973 and possibly 1974.

14 Q Do you recall the type of waste it
15 disposed of?

16 A Some type of chemical.

17 Q Do you recall the volume of waste
18 disposed of?

19 A No, I don't. And I just remembered -- I
20 believe this load was delivered by common carrier.
21 We had nothing to do with picking it up. They
22 delivered the load to us. And I kind of remember
23 that this was such a big corporation that when
24 Dave Head told me that Rohm & Hass had called and

1 inquired about our services -- and knowing who
2 they were a little bit, you know, it made an
3 impression on my mind. Incidentally, the name of
4 the company listed is Affiliated Laboratories,
5 Subsidiary of Rohm & Hass Corporation.

6 MS. TIGHE: Off the record.

7 (Discussion held off the record.)

8 BY MR. KOWALSKI:

9 Q Mr. Martell, did I ask you the volume of
10 waste that was disposed of from Rohm & Hass?

11 A The only one I remember that I am really
12 sure of is their one load. There may have been
13 another load, but I am only aware of the one load.

14 Q Do you recall whether the one load went
15 to one site or the other or both sites?

16 A I am not sure where it went.

17 Q Okay. Do you recall the size of that
18 load?

19 A No, I don't.

20 Q Do you recall whether Rollprint Packaging
21 Products ever disposed of any waste at the U.S.
22 Scrap site?

23 A Yes, they did.

24 Q Do you recall whether Rollprint Packaging

1 Products ever disposed of any waste at the 9th
2 Avenue Dump site?

3 A Yes, they did.

4 Q Do you recall the location of the
5 facility which disposed of those wastes?

6 A 2301 West Wabansia, Chicago, Illinois.

7 Q Do you recall the time period over which
8 those wastes were disposed?

9 A '73 to '74.

10 Q Do you recall the type of wastes
11 disposed?

12 A I am not sure, but I imagine it's ink and
13 dirty solvents.

14 Q Do you recall the volume that was
15 disposed at those sites?

16 A Not at this time.

17 Q Do you recall whether Samuel G. Keywell
18 ever disposed of any waste at the U.S. Scrap site?

19 A Not at this time.

20 Q Do you recall whether Samuel G. Keywell
21 ever disposed of any waste at the 9th Avenue Dump
22 site?

23 A Not at this time.

24 Q Do you recall whether St. Charles

1 Manufacturing Company ever disposed of any waste
2 at the U.S. Scrap site?

3 A I don't think so.

4 Q Do you recall whether St. Charles
5 Manufacturing Company ever disposed of any waste
6 at the 9th Avenue Dump site?

7 A Yes, they did.

8 Q Do you recall the location of the
9 facility which disposed of those wastes?

10 A I believe it was 1611 East Main Street,
11 St. Charles, Illinois.

12 Q Do you recall the time period over which
13 that waste was disposed?

14 A Approximately 1975.

15 Q Do you recall the type of waste?

16 A No, I don't.

17 Q Do you recall the volume of waste
18 disposed in 1975?

19 A Not at this time.

20 Q Do you recall whether Sherwin Williams
21 ever disposed of any waste at the U.S. Scrap site?

22 A Yes, they did.

23 Q Do you recall whether Sherwin Williams
24 ever disposed of any waste at the 9th Avenue Dump

1 site?

2 A I don't think they did.

3 Q Do you recall the location of the
4 facility which disposed of those wastes?

5 A I believe it's 116th and Champlain in
6 Chicago. That's where the office is at.

7 Q Do you recall the time period over which
8 it disposed of those wastes?

9 A I would say it was like 1967 to 1968 or
10 maybe even 1969.

11 Q And do you recall the type of waste?

12 A This was drum covers, steel drum covers
13 and the rings that tighten them down and probably
14 some empty drums.

15 Q Do you recall disposing of any liquid
16 waste for Sherwin Williams?

17 A I don't remember that at all.

18 Q Okay. Do you recall the volume of the
19 waste?

20 A On the rings and covers, there was quite
21 a few. I think there was, like, two or three
22 trailer loads of this here and that's a lot of
23 stuff, you know, when you empty it on the ground.

24 Q Do you recall whether Stenograph ever

1 disposed of any waste at the U.S. Scrap site?

2 A No, I don't think they did.

3 Q Do you recall whether Stenograph ever
4 disposed of any waste at the 9th Avenue Dump site?

5 A Yes, they did.

6 Q Is the full name of that company
7 Stenograph Machines Incorporated?

8 A Right.

9 Q Do you recall the location of the
10 facility which disposed of waste at the 9th Avenue
11 Dump site?

12 A 7300 Niles Center Road, Skokie, Illinois.

13 Q Do you recall the period of time over
14 which those wastes were disposed?

15 A I believe it was 1975.

16 Q Do you recall the type of waste disposed?

17 A Not at this time.

18 Q Do you recall the volume disposed?

19 A Not at this time. ,

20 Q Do you recall whether Transport Service
21 ever disposed of any waste at the U.S. Scrap site?

22 A Yes, they did.

23 Q Do you recall whether Transport Service
24 ever disposed of any waste at the 9th Avenue Dump

1 site?

2 A I don't think so.

3 MS. TIGHE: Off the record.

4 (Discussion held off the record.)

5 MR. KOWALSKI: Would you please read back the

6 last question and answer.

7 (Record read.)

8 BY MR. KOWALSKI:

9 Q Okay, Mr. Martell, in reviewing your
10 notes, would you like to keep that answer or
11 change the answer?

12 A No, I would like to change that answer.
13 And where the confusion comes in is I remember now
14 in one of the running ledgers Transport Service is
15 listed in 1975. So, my answer to 9th Avenue would
16 be yes. Where the confusion comes in is I think
17 this is the company that we hauled waste from a
18 semi-trailer chemical tank cleaning operation in
19 1967 to 1969 at 123rd Stony Island Avenue, but I
20 am not sure if that is the name.

21 Q And your answer about Transport Service
22 disposing of waste at U.S. Scrap, would that
23 remain yes or would that change?

24 A It would be yes, if that's the same

1 company. It would be no if it's not the same
2 company property.

3 Q Okay. And do you recall the location of
4 the facility for Transport Service that disposed
5 of those wastes?

6 A No, I don't -- except that if it is the
7 tank cleaning company.

8 Q In that case, it would be at 123rd and
9 Stony Island?

10 A Yes, it would.

11 Q Okay. And do you recall the type of
12 waste that was disposed from that company?

13 A Which one?

14 Q Transport Service.

15 A On the 1975 load, you mean?

16 Q Yes.

17 A No, I don't.

18 Q Okay. Assuming it's the truck cleaning
19 company, it would be the cleaning waste you have
20 described earlier?

21 A From every kind of chemical there is.

22 Q Okay. And do you recall the volume of
23 that waste from Transport Service?

24 A No, not at this time.

1 Q Do you recall whether Western Community
2 ever disposed of any waste at the U.S. Scrap site?

3 A No, I am not sure at this time.

4 Q Do you recall whether Western Community
5 ever disposed of any waste at the 9th Avenue Dump
6 site?

7 A No, I am not sure at the time. And that
8 was dry waste, incidentally.

9 Q When you say it was dry waste yet you are
10 not sure whether it went to either of those two
11 sites, do you remember them as a customer at some
12 point in time?

13 A I remember where they were, and I
14 remember the factory. I just don't remember us
15 doing any business with them.

16 Q Okay.

17 A But they handled waste paper. That was
18 their primary business.

19 Q Do you recall whether Young Spring & Wire
20 ever disposed of any waste at the U.S. Scrap site?

21 A Yes, they did.

22 Q Do you recall whether Young Spring & Wire
23 ever disposed of any waste at the 9th Avenue Dump
24 site?

1 A I don't think so.

2 Q Do you recall the location of the
3 facility which disposed of waste at the U.S. Scrap
4 site?

5 A 5020 West 73rd Street, Chicago, Illinois.

6 Q Do you recall the period of time over
7 which it disposed waste at the site?

8 A I believe 1971 to 1972.

9 Q Do you recall the type of waste disposed
10 at that site?

11 A I believe it was oils and some kind of
12 chemicals.

13 Q Do you recall the volume of waste
14 disposed over that time period?

15 A Not at this time.

16 Q Do you recall whether Technical Products
17 ever disposed of any waste at the U.S. Scrap site?

18 A Not at this time.

19 Q Do you recall whether Technical Products
20 ever disposed of waste at the 9th Avenue Dump
21 site?

22 A Not at this time.

23 MS. TIGHE: Can we go off the record for a
24 minute?

1 MR. KOWALSKI: Sure.

2 (Discussion held off the record.)

3 MR. KOWALSKI: Back on the record.

4 BY MR. KOWALSKI:

5 Q Mr. Martell, do you recall whether Perk
6 Foods Company ever disposed of any waste at the at
7 the Ninth -- strike that, at the U.S. Scrap site?

8 A I don't think so.

9 Q Do you recall whether Perk Foods Company
10 ever disposed of any waste at the 9th Avenue Dump
11 site?

12 A I believe they did.

13 Q Do you recall the location of the
14 facility which disposed of those wastes?

15 A I think it was 510 North Dearborn Street,
16 Chicago, Illinois.

17 Q Do you recall the time period over which
18 it disposed of those wastes?

19 A 1974 to 1975.

20 Q Do you recall the type of waste disposed?

21 A Some kind of meat or bone waste or
22 probably called a food waste.

23 Q Do you recall anything other than food
24 waste?

1 A No, not at this time.

2 Q Do you recall the volume of waste
3 disposed at that site?

4 A No, I don't recall the volume at this
5 time.

6 Q Do you recall whether McWharter Chemical
7 Company ever disposed of any waste at the U.S.
8 Scrap site?

9 A Yes, they did.

10 Q Do you recall whether McWhorter Chemical
11 Company ever disposed of any waste at the 9th
12 Avenue Dump site?

13 A Yes, they did.

14 Q Do you recall the location of the
15 facility which disposed of those wastes?

16 A Cottage Avenue, Carpentersville,
17 Illinois.

18 Q Do you recall the time period over which
19 those wastes were disposed?

20 A 1973 until 1975.

21 Q Do you recall the type of waste disposed?

22 A Some type of resins in drums.

23 Q Do you recall the volume of waste
24 disposed over that time period?

1 A No, I don't remember.

2 Q Do you recall whether Schmidgall
3 Packaging Corporation ever disposed of any waste
4 at the U.S. Scrap site?

5 A Yes, they did.

6 Q Do you recall whether Schmidgall
7 Packaging Corporation ever disposed of any waste
8 at the 9th Avenue Dump site?

9 A Yes, they did.

10 Q Do you recall the location of the
11 facility which disposed of those wastes?

12 A 1350 West Fullerton Avenue, Chicago,
13 Illinois.

14 Q Do you recall the time period over which
15 they disposed of those wastes?

16 A 1973 until 1975.

17 Q Do you recall the type of waste disposed?

18 A Drums of ink and dirty solvents and
19 adhesives.

20 Q Do you recall the volume of waste
21 disposed over that time period?

22 A Not at this time.

23 Q Do you recall whether Thiele-Engdahl ever
24 disposed of any waste at the U.S. Scrap site?

1 A I am not sure.

2 Q Do you recall whether Thiele-Engdahl ever
3 disposed of any waste at the U.S. Scrap site?

4 A Yes, they did.

5 Q Strike that. 9th Avenue Dump site I
6 meant to say. Your answer is yes?

7 A Yes, they did.

8 Q And do you recall the location of the
9 facility which disposed of wastes at the 9th
10 Avenue Dump site?

11 A 669 Winthrop Avenue, Addison, Illinois.

12 Q Do you recall the period of time over
13 which they disposed of those wastes?

14 A 1974, 1975.

15 Q Do you recall the type of waste disposed?

16 A Ink and dirty solvent waste.

17 Q Do you recall the volume of waste
18 disposed over that time period?

19 A Not at this time.

20 Q Do you recall whether U.P.S. ever
21 disposed of any waste at the U.S. Scrap site?

22 MR. KOWALSKI: Off the record.

23 (Discussion held off the record.)

24 BY MR. KOWALSKI:

1 Q Mr. Martell, I had asked whether you
2 recalled if any waste ever went from U.P.S. to the
3 U.S. Scrap site?

4 A It could have.

5 Q Okay. Do you recall whether any waste
6 ever went from U.P.S. to the 9th Avenue Dump site?

7 A It could have.

8 Q Do you recall the location of the
9 facility from which that waste would have come?

10 A I believe it's 14th and Des Plaines
11 Avenue in Chicago, Illinois.

12 Q Do you recall the time period over which
13 the waste was disposed?

14 A I believe it was late 1973.

15 Q You say you are not sure whether it went
16 to U.S. Scrap or 9th Avenue, but it could have?

17 A At that period of time, both sites were
18 operating and in that volume we were doing -- it
19 would be hard to tell on a little thing like this.
20 It could have went to either site.

21 Q Okay. So, you are sure there was
22 disposal of waste from U.P.S. You are just not
23 sure which particular site it went to?

24 A Right.

1 Q Okay. Do you recall the type of waste
2 that was disposed from U.P.S.?

3 A The little I remember, it had something
4 to do with their -- I think it was their
5 maintenance department so which means it might
6 have been oil or paint or some dirty solvents.

7 Q Do you recall the volume of waste that
8 was disposed?

9 A As best as I can remember, it was a small
10 shipment and it was a one-time shipment.

11 Q Do you recall whether the Pyle-National
12 Company ever disposed of any waste at the U.S.
13 Scrap site?

14 A Yes, they did.

15 Q Do you recall whether the Pyle-National
16 Company ever disposed of any waste at the 9th
17 Avenue Dump site?

18 A Yes, they did.

19 Q Do you recall the location of the
20 facility from which that waste was disposed?

21 A 1334 North Kostner Avenue, Chicago,
22 Illinois.

23 Q Do you recall the time period over which
24 the waste was disposed?

1 A 1973 and 1974.

2 Q Do you recall the type of waste?

3 A No, I don't. Not at this time.

4 Q Do you recall the volume of waste
5 disposed?

6 A Not at this time.

7 Q Mr. Martell, do you recall whether
8 Belmont Plating ever disposed of any waste at the
9 U.S. Scrap site?

10 A I don't think so.

11 Q Do you recall whether Belmont Plating
12 ever disposed of any waste at the 9th Avenue Dump
13 site?

14 A Yes, they did.

15 Q Do you recall the location of the
16 facility which disposed of those wastes?

17 A 3410 North River Road.

18 Q Do you recall the --

19 A And it's Franklin Park, Illinois.

20 Q Do you recall the time period over which
21 it disposed of those wastes?

22 A 1974, 1975.

23 Q Do you recall the type of waste disposed?

24 A Some form of acid waste.

1 Q Do you recall the volume of waste
2 disposed of at that site?

3 A Not at this time.

4 Q Do you recall whether Victor Products
5 ever disposed of any waste at the U.S. Scrap site?

6 A Yes -- can we go off?

7 MR. KOWALSKI: Off the record.

8 (Discussion held off the record.)

9 BY THE WITNESS:

10 A I am not sure.

11 BY MR. KOWALSKI:

12 Q Do you recall whether Victor Products
13 ever disposed of any waste at the 9th Avenue Dump
14 site?

15 A Yes, they did.

16 Q Do you recall the location of the
17 facility which disposed of those wastes?

18 A 5750 West Roosevelt Road, Chicago,
19 Illinois.

20 Q Do you recall the time period over which
21 those wastes were disposed?

22 A 1974, 1975.

23 Q Do you recall the type of waste disposed?

24 A No, only that it was drums -- oh, --

1 Q Do you want to change it?

2 A Yeah, I want to change that. That's a
3 mistake. I'll -- no, that would have to be bulk
4 because it's in the liquid waste list.

5 Q And do you recall the volume of waste
6 disposed?

7 A No. I am not sure about it at this time.

8 Q Do you recall whether Wyeth Laboratories
9 ever disposed of any waste at the U.S. Scrap site?

10 A I don't think so.

11 Q Do you recall whether Wyeth Laboratories
12 ever disposed of any waste at the 9th Avenue Dump
13 site?

14 A Yes, they did.

15 Q Do you recall the location of the
16 facility which disposed of those wastes?

17 A 8100 McCormick Boulevard and its, I
18 guess, post office is Evanston, Illinois.

19 Q Do you recall the time period over which
20 it disposed of those wastes?

21 A 1974, 1975.

22 Q Do you recall the type of waste disposed?

23 A Only that it was some type of chemical
24 waste.

1 Q Do you recall the volume disposed?

2 A I am not sure of the volume at this time.

3 Q Do you recall whether Wilson Steel & Wire
4 Company ever disposed of any waste at the U.S.
5 Scrap site?

6 A I am not sure at this time.

7 Q Do you recall whether Wilson Steel & Wire
8 Company ever disposed of any waste at the 9th
9 Avenue Dump site?

10 A Yes, they did.

11 Q Do you recall the location of the
12 facility which disposed of those wastes?

13 A 4840 South Western Avenue, Chicago,
14 Illinois.

15 Q Do you recall the time period over which
16 those wastes were disposed?

17 A 1974, 1975.

18 Q Do you recall the type of waste disposed?

19 A Approximately 4,000 gallons once a week.

20 Q Do you recall the type of waste that was
21 disposed?

22 A Some type of acid waste.

23 Q Do you recall going to that facility
24 yourself?

1 A Yes, I did. I went there, and I also
2 went by that area a lot. So, I was very familiar
3 with that factory. And a couple times we went
4 over there because the drivers had problems and it
5 was alongside of a railroad embankment. So, I am
6 very familiar with that facility.

7 Q Do you recall whether Elkwood Plating
8 Company ever disposed of any waste at the U.S.
9 Scrap site?

10 A I don't think so at this time.

11 Q Do you recall whether Elkwood Plating
12 ever disposed of any waste at the 9th Avenue Dump
13 site?

14 A Yes, they did.

15 Q Do you recall the location of the
16 facility which disposed of these wastes?

17 A 1657 North Elston Avenue, Chicago,
18 Illinois.

19 Q Do you recall the time period over which
20 it disposed of waste at the 9th Avenue Dump site?

21 A 1974, 1975.

22 Q Do you recall the type of waste disposed?

23 A Some form of acid waste.

24 Q Do you recall the volume disposed of at

1 this site?

2 A Not at this time.

3 Q Do you recall whether Arnold Engineering
4 ever disposed of any waste at the U.S. Scrap site?

5 A I don't think so at this time.

6 Q Do you recall whether Arnold Engineering
7 ever disposed of any waste at the 9th Avenue Dump
8 site?

9 A Yes, they did.

10 Q Do you recall the location of the
11 facility which disposed of those wastes?

12 A Railroad Avenue and West in Marengo,
13 Illinois.

14 Q Do you recall the time period over which
15 those wastes were disposed?

16 A 1974, 1975.

17 Q Do you recall the type of waste disposed?

18 A I am not sure of the type of waste.

19 Q Do you recall the volume of waste
20 disposed over that time period?

21 A Not at this time.

22 Q Mr. Martell, do you recall whether
23 Conservative Chemical ever disposed of any waste
24 at the U.S. Scrap site?

1 A I am not sure at this time.

2 Q Do you recall whether Conservative
3 Chemical ever disposed of any waste at the 9th
4 Avenue Dump site?

5 A I am not sure at this time.

6 Q Do you recall whether CPS International
7 ever disposed of any waste at the U.S. Scrap site?

8 A I believe that's -- I think that's Corn
9 Products Company. I think that's Corn Products,
10 but I am not sure, though.

11 Q Do you recall Corn Products disposing of
12 any waste at the U.S. Scrap site?

13 A Yes, they did.

14 Q Do you recall whether Corn Products
15 Company ever disposed of any waste at the 9th
16 Avenue Dump site?

17 A Yes, they did.

18 Q Do you recall the location of the
19 facility?

20 MS. TIGHE: Excuse me. Didn't we cover this
21 before?

22 THE WITNESS: We did. Yeah, we did this.

23 MR. KOWALSKI: You are right. I am sorry.

24 Okay.

1 BY MR. KOWALSKI:

2 Q Okay. Moving on, Mr. Martell, you are
3 not aware of any CPC International aside from Corn
4 Products Company?

5 A No, that's the only one I can remember.

6 Q Okay. Do you recall whether Levey Dun
7 ever disposed of any waste at the U.S. Scrap site?

8 A I don't remember.

9 Q Do you recall whether Levey Dun ever
10 disposed of any waste at the 9th Avenue Dump site?

11 A No.

12 Q Do you recall whether Roto-Graphics ever
13 disposed of any waste at the U.S. Scrap site?

14 A No, I don't remember at this time.

15 Q Do you recall whether they disposed of
16 any waste at the 9th Avenue Dump site?

17 A No, I don't remember at this time.

18 Q Do you recall whether the Niles Park
19 District ever disposed of any waste at the U.S.
20 Scrap site?

21 A No, I don't remember at this time.

22 Q Do you recall whether the Niles Park
23 District ever disposed of any waste at the 9th
24 Avenue Dump site?

1 A No -- only vaguely and it's very vague,
2 but I think we did a vacuum tanker or Vac All job
3 there on their waste treatment plant. But, again,
4 I am not really sure.

5 Q Okay. Do you recall when that was?

6 A It would have to be '72, '73, somewhere
7 in and around there.

8 Q Do you recall where that waste would have
9 gone?

10 A It could have gone to either place.

11 Q Do you recall what type of waste it was?

12 A It would be sewerage sludge.

13 Q Mr. Martell, do you recall whether H.B.
14 Fuller Company ever disposed of any waste at the
15 U.S. Scrap site?

16 A Yes, they did.

17 Q Do you recall whether H.B. Fuller Company
18 ever disposed of any waste at the 9th Avenue Dump
19 site?

20 A Yes, they did.

21 Q Do you recall the location of the
22 facility which disposed of those wastes?

23 A 315 South Hicks.

24 Q And where is that located, do you know?

1 A No, I don't know at this time.

2 Q Could that be Palatine?

3 A It's northwest, I remember that.

4 Q Okay. If you don't recall, that's fine.

5 A Okay.

6 Q Do you recall the time period over which
7 H.B. Fuller disposed of waste at the two sites?

8 A About 1973 to 1975.

9 Q Do you recall the type of waste disposed?

10 A Some kind of adhesives and coatings.

11 Q Do you recall the volume of waste
12 disposed?

13 A No, I don't. I just know it was
14 delivered in 55-gallon drums and delivered to both
15 sites. And it was delivered by a hauler named
16 Steve Gregory.

17 Q Do you recall whether Fry Roofing or
18 Trumbull Asphalt ever disposed of any waste at the
19 U.S. Scrap site?

20 A Yes, they did.

21 Q Do you recall whether they ever disposed
22 of waste at the 9th Avenue Dump site?

23 A Yes, I believe they did.

24 Q Do you recall the location of the

1 facility which disposed of those wastes?

2 A 58th and Archer Road, Summitt, Illinois.

3 Q Do you recall the time period over which
4 it disposed of those wastes?

5 A 1972 to 1973.

6 Q Do you recall the type of waste disposed?

7 A Some kind of asphalt or tar from a
8 storage tank cleaning job.

9 Q Was that a one time job?

10 A Yes, it was.

11 Q Do you recall the volume involved in that
12 disposal?

13 A 2,000, 3,000 maybe 4,000 gallons.

14 Q Mr. Martell, I am going to show you once
15 again what's been previously marked Deposition
16 Exhibit No. 1 for identification and ask you to
17 glance over that.

18 A Okay.

19 Q That consists of 16 pages of what appear
20 to be some kind of ledger sheets, and I think you
21 testified earlier that the notation, at least on
22 the top of Page 1, was in your hand, is that
23 correct?

24 A Right.

1 Q Did you prepare the remainder of that
2 list?

3 A No, I didn't.

4 Q Okay. Is that the kind of list that was
5 kept in connection with U.S. Scrap Corporation's
6 business?

7 A Right.

8 Q Okay. And would that have been kept at
9 the U.S. Scrap business offices?

10 A Yes, it would.

11 Q Okay. And do you know how that document
12 happened to be uncovered?

13 A Only that my attorney gave it to me, a
14 copy of it.

15 Q Okay. And do you know where she obtained
16 it?

17 A I believe she got it from 391 East
18 Kensington Street or some of them anyway.

19 Q And what's located at 391 Kensington
20 Street?

21 A The office of U.S. Scrap.

22 Q Okay. And is that the location where any
23 business documents for U.S. Scrap Corporation
24 would have been kept?

1 A Yes, they were.

2 Q Do you know who prepared the remainder of
3 this document?

4 A No, I don't. Some of it is -- a little
5 but of it is mine, but some clerk working in the
6 office.

7 Q Okay. So that would be some employee of
8 U.S. Scrap Corporation?

9 A Right.

10 Q Okay. And that would have been kept in
11 connection with U.S. Scrap Corporation's business
12 operations?

13 A Yes, it would.

14 Q And the notations in those sheets, would
15 those have been kept and entered at the time the
16 transaction was made?

17 A Yes, they would.

18 Q Okay. And is that the kind of document
19 that would have been kept in the ordinary course
20 of U.S. Scrap Corporation's business?

21 A Yes, it was.

22 Q Are you generally familiar, Mr. Martell,
23 with the entries in this document?

24 A Mostly the first four pages and -- where

1 we were pricing. The first four pages represent
2 the prices per drum for pick up and also as the
3 changes are made. And then on the side you
4 notice, "R" this is where I would look at them.
5 Dave Head would hand me the sheet, and we would
6 start looking to see how long we have been hauling
7 at that price and if it was, you know, if we were
8 entitled to raise the price a little higher.

9 Q Okay, so the -- on the first page there
10 is a notation "R" in the left-hand column,
11 correct?

12 A Yes, it is.

13 Q And that notation is in your hand?

14 A Yes, it is.

15 Q Okay. And what were the circumstances
16 where you made that notation?

17 A Wherever there was an "R" that's -- we
18 would raise the price.

19 Q Okay. And was that "R" made at the time
20 the price was raised?

21 A I honestly don't know at this time.

22 Q Would it be made in that general area?

23 A It would be made then, about that time.

24 Q Okay. And that would be made as you went

1 through the list with David Head deciding when the
2 price would be raised?

3 A Right.

4 Q The first column is headed, "Customer," I
5 take it that means the names underneath would be
6 customers of U.S. Scrap Corporation?

7 A Yes, they would.

8 Q And the next column is labeled, "First
9 price." What is the meaning of that column?

10 A Well, it might mean just the price at the
11 present time or the price that we started in with
12 a company that we are going to haul their waste.

13 Q Okay. And the next column is labeled,
14 "Price." Do you know what that means?

15 A That means that's the new price. This
16 probably shows where it started at and where we
17 are at now in this time frame, whenever that was.

18 Q Okay. So that the, "First price," column
19 would be the initial price charged a customer and
20 then the second column labeled, "Price," would
21 mean what the price was increased to?

22 A Right.

23 Q Okay. And the next column is labeled,
24 "Service started." What would that indicate?

1 A That means when we started hauling.

2 Q And the next column is entitled, "Date
3 raised." What would that indicate?

4 A When we raised the price.

5 Q Okay. Are there any other notations on
6 this first page, Mr. Martell, that are in your
7 handwriting?

8 A At the top of the page it says, "Spot
9 tank to load. Now cost \$35," and it says, "D.
10 Head," under it, but it's in my handwriting and
11 that means: To take a tanker to somebody's factory
12 and just drop an empty tanker; that is, so they
13 can load it, it no longer was free. We were
14 charging \$35 for that service at that time.

15 Q And do you remember making that notation
16 in connection with U.S. Scrap Corporation's
17 business operations?

18 A Vaguely, but it's my handwriting.

19 Q Turning to Page 2 of Deposition Exhibit
20 No. 1, are any notations on that page in your
21 handwriting?

22 A On the top it says, "Check last load of
23 Morton," but I am not sure what it really means.
24 Why we were checking the loads.

1 Q Is that in your handwriting?

2 A Yes, it is.

3 Q Okay. And are there any other notations
4 on that page there in your handwriting?

5 A Yes, there are a lot of, "Rs" and a
6 ccuple of question marks. And -- as best I can
7 remember, the "Rs" are for raising. "R" means
8 raise, and "?" is like my indication to Dave that
9 he should start thinking about that.

10 Q Okay. And the "R" notation and the "?"
11 on the third page is also in your handwriting?

12 A Yes, it is.

13 Q And would have the same meaning?

14 A Yes, it would.

15 Q Going to the fourth page, the first
16 column is again entitled, "Customer," and has
17 names underneath and then there is a column
18 labeled, "Price," and a column labeled, "Year,"
19 and the heading at the top of that page is, "Old."
20 Do you know the meaning of this page?

21 A No, I don't.

22 Q Okay. Turning to the fifth page it says,
23 "Sales for May 1975," at the top. Did you have
24 any handwriting notations on this page?

1 A No, I didn't.

2 Q Okay. Let me ask you to look through the
3 remainder of that document starting with Page 6,
4 and tell me if there are any of your notations on
5 any of those pages.

6 A No, no more of my handwriting is on any
7 of the remaining pages.

8 MR. KOWALSKI: Can you mark this as Exhibit
9 No. 2 for identification, please.

10 (Whereupon, Martell Deposition
11 Exhibit

12 No. 2 was marked for
13 identification.)

14 BY MR. KOWALSKI:

15 Q Mr. Martell, before I move on to what I
16 have had marked as Exhibit No. 2 for
17 identification, is there any question in your mind
18 whether the companies listed in Deposition Exhibit
19 No. 1 were customers of U.S. Scrap Corporation?

20 A Absolutely not.

21 Q And as customers of U.S. Scrap
22 Corporation, would their waste have gone to either
23 the U.S. Scrap or 9th Avenue Dump sites?

24 A Yes, they would.

1 Q Okay. I would like to show you now what
2 I have had the court reporter mark as your
3 Deposition Exhibit No. 2 which is a seven-page
4 document entitled, "Agreement," with an attached
5 two-page Exhibit A. And I will just ask you to
6 look that over quickly.

7 A Okay.

8 Q Okay. Mr. Martell, do you recognize that
9 document?

10 A Yes, I do.

11 Q Okay. And what is it?

12 A It is a piece of paper where we -- an
13 agreement, I guess you called it -- where we sell
14 the accounts that were of the bulk hauling nature
15 or tanker or vacuum tanker type to a company
16 called Liquid Waste Incorporated.

17 Q Okay. And that agreement was entered
18 into on January 6, 1976?

19 A I believe it was.

20 Q And is that your signature on the last
21 page of the agreement?

22 A Yes, it is.

23 Q Can you tell me what the two-page
24 document is, attached as Exhibit A to that

1 agreement?

2 A It's a list of the accounts or customers
3 which they were purchasing the right to haul from.

4 Q And were those U.S. Scrap Corporation's
5 customers?

6 A Yes, they were.

7 Q And those were bulk load accounts?

8 A Yes, they were.

9 Q And when you say, "bulk load," you mean
10 other than drums?

11 A Other than drums, right.

12 Q Okay. And did you prepare Exhibit A?

13 A No, I did not.

14 Q Were you involved with the preparation of
15 Exhibit A?

16 A Undoubtedly, we -- in splitting up what's
17 bulk and drums, I had something to do with it.

18 Q Okay. Was that list put together at your
19 request?

20 A I am not sure.

21 Q Okay. Do you recall reviewing the list
22 prior to entering into the attached agreement?

23 A I believe I did.

24 Q Okay. And in reviewing that list, did

1 you satisfy yourself that the companies named in
2 that list were bulk load customers of U.S. Scrap
3 Corporation?

4 A Yes, they were.

5 Q Turning to the next to the last page of
6 the document, which is the page headed Exhibit A,
7 the first column is labeled, "Customers," and I
8 take it those were the customers being sold?

9 A Yes, they were.

10 Q And the second column is headed,
11 "Distance miles." Can you tell me what that
12 means?

13 A I have no idea.

14 Q Okay. Do you know distance in miles from
15 where to where?

16 A I tried it a couple times myself, and it
17 doesn't make sense.

18 Q Okay. The third column is labeled,
19 "Product type." Do you know what that means?

20 A Yes, that would be the nature of the
21 waste to be picked up.

22 Q And the forth column is headed,
23 "Pricing." What would that indicate?

24 A That was the charge per gallon or in some

1 cases a minimum charge regardless of what they had
2 for picking up the waste.

3 Q Okay. And the final column is headed,
4 "1975 to 11-31-75." Can you tell me what that
5 indicated?

6 A I believe that's like a running total of
7 how much business we generated by each customer on
8 his line, and that was like the balance for them
9 months.

10 Q Okay. So, all of the companies with
11 figures in that final column would have had waste
12 disposed of by U.S. Scrap Corporation in 1975?

13 A Right.

14 Q And would that waste have gone to either
15 U.S. Scrap or 9th Avenue Dump?

16 A Either one.

17 Q And on the final page there are
18 additional names. Are those also customers of
19 U.S. Scrap Corporation?

20 A Yes, they were.

21 Q And would their waste also have gone to
22 either U.S. Scrap or 9th Avenue Dump?

23 A Yes, it would.

24 MR. KOWALSKI: Can you please mark this as

1 Exhibit No. 3?

2 (Whereupon, Martell Deposition

3 Exhibit

4 No. 3 was marked for

5 identification.)

6 BY MR. KOWALSKI:

7 Q Mr. Martell, you have in front of you a

8 diagram depicting the 9th Avenue Dump site. Do

9 you recognize the site in the diagram?

10 A The 9th Avenue site?

11 Q Yes.

12 A Roughly.

13 Q Okay.

14 A Plus I see the 9th Avenue here.

15 Q Mr. Martell, were you present on the site

16 during dumping operations?

17 A I am not sure. I think so, but I am not

18 sure.

19 Q Okay. I am just trying to get some idea

20 of how personally familiar you are with the

21 operations that went on out there. Did you visit

22 the site a lot during operations, or did you keep

23 track of it just through talking to employees?

24 How did that work?

1 A Yes, I visited the site, you know, to see
2 if everything was all right, and, you know, to see
3 if the place was okay for the trucks to go in and
4 out.

5 Q Okay. When the dumping first started at
6 the 9th Avenue Dump site, can you tell me where
7 the dumping was conducted?

8 A Well, I really don't know, but, I
9 would -- you know, as you said in the way we
10 bought it, you know -- or let's say the document
11 showed the buying thing, we bought the back first
12 and then the front second. Despite that, I think
13 we started in the front.

14 Q When you say the front, you are referring
15 to the northern portion?

16 A Northern portion toward 9th Avenue or the
17 gate or the entrance -- because if this is it
18 here, it's blocked out. We have never been over
19 in this part here. We never got that far.

20 Q You never got -- you are indicating to
21 the southern portion of the site?

22 A I would say about a third of it or maybe
23 40 percent is still virgin land with trees and all
24 that on it. So, it would be from here to here

1 (indicating).

2 Q From here to here would be the top -- the
3 northern two-thirds portions of the site?

4 A Approximately.

5 Q Okay.

6 A And as far as where we started, I really
7 don't remember except it probably wasn't near
8 here. It was probably somewhere near that back
9 part there or maybe a 40 percent mark.

10 MS. TIGHE: Off the record for a minute.

11 (Discussion held off the record.)

12 BY MR. KOWALSKI:

13 Q Mr. Martell, is there any distinction
14 made as to where specific kinds of waste would go
15 on the 9th Avenue Dump site?

16 A I don't think so.

17 Q Okay.

18 A I am not really sure that much how they
19 did it, because they -- a lot of it was done
20 almost all by themselves, by the drivers, and the
21 people who were out there.

22 Q Was there anyone who was stationed at the
23 site or stayed there on a full-time basis who
24 would give directions or some kind of guidance

1 where those wastes would go?

2 A I think most of the times no. Sometimes
3 Earl Klepser was there. He ran a bulldozer. But
4 on most of the times, there was nobody there
5 really.

6 Q So, the drivers would take the load down
7 and decide where it would be disposed themselves?

8 A Right.

9 Q Did both bulk waste as well as drums go
10 to the Ninth Avenue site?

11 A Yes.

12 Q Do you know, Mr. Martell, any specific
13 areas that stand out in your mind where certain
14 things were disposed at that site?

15 A The only thing I remember is that near
16 the front here and, again, it's hard to tell you
17 where exactly, except there was like a little
18 island -- and I haven't been there in years, so I
19 don't know what you people have done out there or
20 how it looks now. But there was like a little
21 island here. From that island to the northwest,
22 there were some drums buried over there.

23 Q Okay. When you say drums, were those
24 full drums of waste?

1 A Full drums right.

2 Q Okay. I know it's difficult from this
3 map and also from your recollection, but let me
4 ask you to the best of your ability, Mr.
5 Martell -- and taking into consideration that it
6 won't necessarily be perfectly accurate, but just
7 for our own information, could you mark on here
8 the area where you think those drums are located
9 or were located?

10 A (Indicating.)

11 Q Okay. And you're marking that in red
12 ink, and could you just initial that for me for
13 indentification purposes?

14 A Okay.

15 Q Okay. And can you tell me how many full
16 drums were buried in that area?

17 A Oh, I don't remember.

18 Q Okay. Hundreds, thousands?

19 A Oh, no, I would say like a hundred.

20 Q Okay. And do you know what was in the
21 drums?

22 A No, not really.

23 Q Okay. Do you know which customer they
24 came from?

1 A No.

2 Q Do you recall when they were buried?

3 A No.

4 Q Do you recall the condition of the drums?

5 A I think they were pretty good, in pretty
6 good shape, solid drums.

7 Q Is there any specific reason those drums
8 were buried full without being emptied?

9 A I think they emitted a little smoke when
10 you tried to open them up, and that's why they
11 closed them back up.

12 Q Were you there when those were buried, or
13 were you just told about it?

14 A No, I was there when they were buried.

15 Q Was that one load of drums?

16 A I think it would be more than one load,
17 like, maybe two loads.

18 Q Okay. But a total of approximately a
19 hundred drums?

20 A A hundred drums, give or take a few each
21 way.

22 Q Are there any other occasions, that you
23 recall, when intact drums were buried full of
24 waste?

1 A I don't remember.

2 Q Okay. That's the only occasion that
3 really sticks in --

4 A That one stands out in my mind.

5 Q -- your memory?

6 A Yes, it does.

7 Q Okay. Generally, you ran a drum recycling
8 operation, correct?

9 A Yes.

10 Q Okay. So, I take it the idea was to
11 empty out the drums and recycle the drums?

12 A Uh-huh.

13 Q Would there also be occasions when the
14 drums were in poor condition and the whole drum
15 was just buried?

16 A Yes, sometimes a drum would be where it
17 just wouldn't dump out.

18 Q Okay. Was there any specific area of the
19 Ninth Avenue or the U.S. Scrap site where the
20 drums would be buried as opposed to where just the
21 liquid would be buried?

22 A Oh, in the Ninth Avenue -- let's see.
23 The drum dumping operation would be about probably
24 over here. Somewhere about over here

1 (indicating).

2 Q Can you just indicate on here put, "Drum
3 dumping operation," on it for me.

4 A (indicating.)

5 Q Okay. When you say, "drum dumping
6 operation," do you mean that's where the drums
7 would be put?

8 A Be emptied out.

9 Q Okay.

10 A And then probably near there is where
11 there would be some drums that are full.

12 Q All right. Now is there a different area
13 of the Ninth Avenue site where the bulk waste
14 would be placed?

15 A Well, it went all over the place.

16 Q Okay. That would be all over, but the
17 drum dumping operation was just this specific
18 place?

19 A Well, it was this one corner so it
20 wouldn't get the guys all wet and that.

21 Q Okay. I understand. Was there some kind
22 of platform or dock in the drum dumping area?

23 A Right. A flatbed trailer was the dock.

24 Q Okay.

1 MR. KOWALSKI: Could you mark this one as
2 Exhibit No. 4 for identification?

3 (Whereupon, Martell Deposition
4 Exhibit

5 No. 4 was marked for
6 identification.)

7 BY MR. KOWALSKI:

8 Q Mr. Martell, almost done here. Bear with
9 me. I am showing you what's been labeled as your
10 Deposition Exhibit No. 4 for identification which
11 is a true diagram of the U.S. Scrap site -- what I
12 call the U.S. Scrap site, what you call the
13 elevator site. Do you generally recognize the
14 site from that drawing?

15 A More or less.

16 Q Okay. You will see noted on there what's
17 indicated to be, "loading dock, abandoned well,
18 incinerator and silos," among other things.
19 According to your recollection, do those generally
20 accurately locate those items on the site?

21 A Yeah, it's probably a little bit off, but
22 it's pretty close. What are these little marks
23 over here?

24 Q Okay. Those -- the grid areas indicate

1 areas of clay capping.

2 A Oh, I see.

3 Q Now, on the U.S. Scrap site, was the
4 dumping, again, done pretty much all over the
5 site?

6 A All over the site.

7 Q Okay.

8 A From one end to the other.

9 Q Was there a separation between drum
10 dumping activity and bulk dumping activity on that
11 side?

12 A Right. The drum dumping was over here
13 (indicating).

14 Q Here, indicating the loading dock?

15 A Right.

16 Q And the bulk was --

17 A Well, it was like really all over, you
18 know, wherever you went. See, the drum dumping
19 really started out over here (indicating). This
20 used to be a little, like, a marsh, and they would
21 start out here.

22 Q Okay. You are showing kind of the
23 northwestern portion of the site?

24 A Actually, kind of like that gridded mark

1 there, even, and as it got filled up then the
2 sides -- we built the sides up out of clay. And
3 then we would dump full drums that didn't dump
4 into there and, you know, that would like make it
5 more complete all the time, for a lack of a better
6 word. But then after a while, this got to be too
7 difficult to work with, and then we finally went
8 to a drum dumping operation with a dock.

9 Q And that's what's indicated there in the
10 central portion?

11 A Yes, it is.

12 Q Was there any disposal in the area south
13 of the silos?

14 A Oh, yeah.

15 Q Okay. Do you recall -- was anything in
16 particular disposed down there?

17 A The same thing that was disposed all
18 over.

19 Q Okay. There was no segregation of waste
20 type in that area?

21 A No, not really. Not that I remember.

22 Q Okay. And the initial waste disposal
23 activity started north of the loading dock?

24 A Right.

1 Q Okay. And then when that got filled up,
2 you moved south?

3 A That's right.

4 Q Okay. This -- what's labeled, "abandoned
5 well," on the diagram -- do you know anything
6 about that well?

7 A No, I was just looking at that. That
8 doesn't ring a bell at all.

9 Q Okay. You don't recall any well on this
10 site?

11 A No, none at all.

12 Q Do you recall any dumping areas in the
13 far northern portion of the site?

14 A Uh-huh, all the way up to the corner.

15 Q All the way up to the edge of the
16 property on the north?

17 A Right.

18 Q Okay. And, again, that wasn't any
19 particular kind of dumping but just the
20 generalized dumping?

21 A Everything.

22 Q Was there ever any dumping done off site
23 west of the railroad tracks?

24 A I don't think so, and I don't remember if

1 there was. I don't think so.

2 Q Okay. And, again, just so I am clear,
3 there was an office trailer kept on the site, is
4 that right?

5 A Correct. There was an office trailer
6 about over here (indicating).

7 Q You are indicating just southeast a
8 little bit of the loading dock?

9 A Yes.

10 Q Okay. And what was done in the office
11 trailer?

12 A The trucks were dispatched from that
13 office trailer to pick up loads and also take the
14 tickets from the drivers.

15 Q Okay. Final questions, Mr. Martell. We
16 have gone through the ledger sheets that were
17 labeled Exhibit No. 1, the customer list attached,
18 the Liquid Waste Agreement. Were there any other
19 documents kept in connection with U.S. Scrap's
20 business operations that would indicate who the
21 customers were, that you are aware of?

22 A I don't understand the question.

23 Q Okay. My understanding is the drivers
24 would be given trip tickets when they went to pick

1 up loads of waste?

2 A Right.

3 Q Would those have the customer indicated
4 on them, the company?

5 A Oh, yeah.

6 Q Do you know what happened to those trip
7 tickets or invoices?

8 A The only thing I remember is that when
9 the company went into assignment for the benefit
10 of creditors, all records were taken by the courts
11 or their people to some sort of a bounded
12 warehouse. And that's the last we saw of them.

13 Q Okay. What I am getting at, Mr. Martell,
14 is I am just trying to find out what other
15 documents were kept and were given over in
16 connection with that bankruptcy. So, those
17 invoices would have been given over?

18 A Oh, yes, they were given.

19 Q Okay. Were there any other documents
20 kept listing the customers for U.S. Scrap
21 Corporation?

22 A You mean the missing documents?

23 Q Any documents, yes.

24 A Well, there was all sorts of documents

1 and the only thing is that Leonard Spyra
2 (phonetic) -- that's right, Leonard Spyra was the
3 court-appointed trustee, I believe you call them,
4 and he designated the people that he had working
5 in there to remove all the records. And I
6 remember them boxing everything up. Then all the
7 records were loaded in some kind of a truck and
8 taken to wherever they took them. And that was
9 the last time we saw the records, but there was
10 lots of records.

11 Q Do you know where the records were taken?

12 A I don't -- Ann, do you know where they
13 were taken?

14 MS. TIGHE: No.

15 BY THE WITNESS:

16 A No, I don't know where they were taken.

17 BY MR. KOWALSKI:

18 Q Do you recall specifically the company
19 that removed them?

20 A I just remember it was Leonard Spyra, the
21 court-appointed trustee.

22 Q Was he there at the time the records were
23 being removed?

24 A I believe so. I am not sure, but I

1 believe so. I remember one of his men were there,
2 and his name was Larry Cooper.

3 Q Larry Cooper?

4 A Yeah, Lawrence Cooper.

5 MS. TIGHE: Off the record.

6 (Discussion held off the record.)

7 BY MR. KOWALSKI:

8 Q Final question, Mr. Martell. As you sit
9 here today, you are not aware of any other records
10 relating to U.S. Scrap Corporation or its
11 operations that are in your possession or in any
12 other employees' possession at this time?

13 A Not to my knowledge.

14 MR. KOWALSKI: Okay.

15 MS. TIGHE: I have a couple of questions.

16 MR. KOWALSKI: Certainly.

17 MS. TIGHE: Believe it or not.

18 EXAMINATION

19 BY MS. TIGHE:

20 Q Steve -- Mr. Martell, just looking for a
21 minute at Martell Deposition Exhibit No. 4, which
22 is the rendition of the U.S. Scrap area, do you
23 know whether at one time you reached an agreement
24 with the Metropolitan Sanitary District and with

1 the Illinois EPA and the Illinois Attorney
2 General's Office to perform a cleanup of this
3 site?

4 A Yes, we did.

5 Q And did you perform that cleanup?

6 A Yes, we did.

7 Q And did you perform that cleanup pursuant
8 to the wishes of the Illinois EPA?

9 A Yes.

10 Q As far as documents -- the documents of
11 U.S. Scrap are concerned, Mr. Kowalski asked you
12 if there were other documents that would have been
13 made. You indicated, I think, "Yes, there would
14 have been numerous documents." Would there, to
15 your knowledge, have been other documents similar
16 to the documents in Martell Deposition Exhibit No.
17 1?

18 A Yes, they would have.

19 Q And do you now know -- as you sit here
20 now, know where any of those other documents are?

21 A No, I don't.

22 Q Have you caused your employees and your
23 attorneys and so on to search for those documents?

24 A Yes, I have.

1 MS. TIGHE: All right. That's all.

2 THE WITNESS: You mean we are already done?

3 MR. KOWALSKI: Just one follow-up question.

4 FURTHER EXAMINATION

5 BY MR. KOWALSKI:

6 Q Mr. Martell, were you aware of any
7 information kept by any of the U.S. Scrap
8 employees, specifically Robert Baich or Lynn
9 Tyree, on index cards that would have possibly
10 named customers and other information regarding
11 those customers?

12 A Yes, I was.

13 Q Okay. And just generally what kind of
14 information was kept on those cards?

15 A I believe these were more or less
16 four-by-six index cards in a little metal box. I
17 wasn't aware that Lynn Tyree had it, but I knew
18 Mr. Baich had it. And what it was -- Mr. Baich
19 was a fairly orderly man, and on the card he would
20 name the company; the address; any peculiarities
21 in the entrance of the plant; it would say who the
22 plant manager was; who you contacted when you got
23 there to pick up a load; what the load was; what
24 kind of truck; if it was drums or if it was bulk

1 load; if it was a bulk load, how much hose you
2 needed, again, any peculiarities in your hoses and
3 that; or if there was a hose left -- sometimes we
4 left the hoses right at the factory, if they had
5 enough volume; all those things there and who to
6 call in case of an emergency; nighttime phone
7 numbers. It just about had everything on that
8 card.

9 Q And those records were kept by U.S. Scrap
10 employees?

11 A Yes, they were.

12 Q And they were kept in connection with the
13 day-to-day operations of the business?

14 A Yes, they were.

15 Q And would that information be placed on
16 the card at or about the time the information
17 became known to the employee?

18 A Right.

19 Q Okay. Do you think if you saw those
20 cards again you would recognize them?

21 A Absolutely.

22 MR. KOWALSKI: Those are all I have. Thank
23 you.

24 MS. TIGHE: That's it.

1 MR. KOWALSKI: Ann, what about signature?

2 MS. TIGHE: We'll read.

3 MR. KOWALSKI: Okay. Signature reserved.

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1 UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
2 REGION V

3 IN RE THE MATTER OF:)
4 U.S. SCRAP CORPORATION)
Chicago, Illinois)
5 and)
6 9th AVENUE DUMP)
Gary, Indiana)
7

8 I, STEVE MARTELL, state that I have
9 read the foregoing transcript of the testimony
10 given by me at my deposition on the 22nd day of
11 November, 1988, and that said transcript
12 constitutes a true and correct record of the
13 testimony given by me at said deposition except as
14 I have so indicated on the errata sheets provided
15 herein.
16

17 _____
Steve Martell

18 No corrections (Please initial) _____
19 Number of errata sheets submitted _____ (pages.)

20 SUBSCRIBED AND SWORN TO
21 before me this _____ day
of _____, A.D., 1988.

22 _____
Notary Public
23
24

1

2 STATE OF ILLINOIS)
) SS.
3 COUNTY OF C O O K)

4

5 I, MARIA MIRAMONTES, CSR, a notary
6 public in and for the County of Cook and State of
7 Illinois, do hereby certify that Steve Martell was
8 by me first duly sworn to testify to the truth,
9 the whole truth, and nothing but the truth, and
10 that the above deposition was recorded
11 stenographically by me and reduced to typewriting
12 by me.

13

14 I FURTHER CERTIFY that the foregoing
15 transcript of the said deposition is a true,
16 correct, and complete transcript of the testimony
17 given by the said witness at the time and place
18 specified hereinbefore.

19

20 I FURTHER CERTIFY that I am not a
21 relative or employee or attorney or counsel of any
22 of the parties, nor a relative or employee of such
23 attorney or counsel, or financially interested
24 directly or indirectly in this action.

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I FURTHER CERTIFY that my
certificate annexed hereto applies to the original
and typed transcripts only, signed and certified
transcripts only. I assume no responsibility for
the accuracy of any reproduced copies not made
under my control or direction.

IN WITNESS WHEREOF, I have hereunto
set my hand and affixed my seal of office at
Chicago, Illinios, this 28 of November, A.D.,
1988.

Maria Miramontes

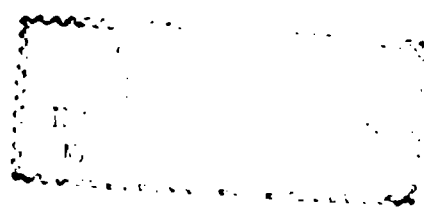
MARIA MIRAMONTES
318 West Randolph
Chicago, Illinois

60601

(312) 984-1033

C.S.R. License No. 084-003283

My notary commission
expires August 2, 1992.

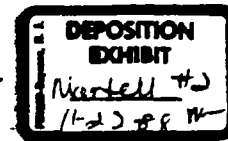


APRIL 30, 1975

Customer	Present Balance	Less 30 D.	Amounts past due			Remarks
			31 to 60 D.	61 to 90 D.	Over 90 D.	
peco	540-	342-	198-			pd 128.73
Benj Moore	200-	200-				pd
Boyle Midway	150-	150-				pd
Brightly Gal.	245-	245-				pd
Bargill	306-	306-				pd
hgo + N.W.	415 ²⁵			415 ²⁵		overpaid
hgo Roto Airt	1115-	706-	409-			
hgo Sheepskin	875-	875-				700.76
Black Oil	7041.77	7041.77				pd 6842.07 $\frac{3}{16}$
Collins Co.	700-	700-				
Contl. Can	131.75	131.75				pd
CP Clare	221-	221-				pd
Elligan	148 ⁵⁰	148 ⁵⁰				pd
Dreeblan Pt	2600					pd 575.5-12
Electronic Ptg	168-		168-			pd 200 $\frac{9}{2}$
Enterprise Wire	3792-	3792-				pd 2432 $\frac{7}{5}$
Good Humor	1470-	1470-				
Hendrickson Mfg.	270-	270-				
Hot Point RE	480-	480-				
Howell	600-	600-				pd 41
Intl Harv.	2520-					pd 225.5-12 pd 32 $\frac{5}{11}$
Jones + Cleary	1737 ⁵⁰				1737 ⁵⁰	pd 325 $\frac{7}{1}$ pd 2451
Kara Lee	3960-	3960-				
La Salle Mgmt	150-	150-				pd $\frac{7}{2}$
Libby	100-	100-				pd $\frac{7}{5}$
Linkbloom HS	100-	1	100-			
Lac Clean Fogg	500-	500-				
Magee Chem	500-	500-				pd
Martin Senour	1900-	1900-				
Midwest Brass	300-	300-				900
Midwest Recy.	125-				125-	cannot pay
Morton Chem.	2152 ⁵⁰	2152 ⁵⁰				pd 549.50 $\frac{7}{1}$
Motive Ind.	1050-	630-	420-			open 712 $\frac{7}{1}$ pd 110
Natl Can L.P.	1830-	1480-	350-			

APRIL 30, 1975

Customer	Amounts Past Due					Remarks
	Present Balance	Less 30 D.	31 to 60 D.	61 to 90 D.	Over 90 D.	
atl. Precision Cir. ✓	160-	160-				pd
Pierce & Stevens ✓	375-	375-				pd
Pittsburgh Metals	315-	315-				
Precision Twist & Drill	300-	300-				
Pauland	652 ⁵⁰	652 ⁵⁰				
Reflector Hardware	355-	355-				pd
Regal Tube ✓	7717 ⁵⁰	7717 ⁵⁰				pd
Republic Steel ✓	200-	200-				pd
Rezene ✓	9205-	9205-				pd
Richardson Graphics	292-	292-				pd
Rustoleum ✓	920-	920-				pd
Safe proof Div. ✓	346 ⁵⁰	346 ⁵⁰				pd 7/2
Specified Pltg. ✓	264-		264-			pd 7/1
Specialty Coatings	247 ⁵⁰	247 ⁵⁰				
Spot nails ✓	500-	500-				pd 250 7/6 pd
T.E. Staley	150-	150-				
Stein Hall	1440-	1440-				be late 5/30
Sun Chem NL	199 ⁷⁵	199 ⁷⁵				
Txaco	1775 ⁵⁰		1775 ⁵⁰			
Thor. Power	300-		300-			
Transport Service	190-	90-	100-			
Unroyal ✓	1858-	1858-				pd
US Steel Gary ✓	1555 ⁵⁰		1555 ⁵⁰			pd 7/1-
Underwood ✓	140-			140-		pd
elsieol ✓	78-	78-				pd
Lenus Lab.	140-	140-				
Uyco tool	156-				156-	pd 7/1
Symen Gordon ✓	525-	525-	525-			pd 7/1
Total	69,051.82					



AGREEMENT

THIS AGREEMENT made the 6th day of January, 1976 by and between LIQUID ENGINEERING CORP., an Illinois Corporation, U. S. SCRAP CORP., an Illinois Corporation and STEVE MARTELL, of Dolton, Illinois, the ~~corporation, hereinafter referred to as, "Company", Steve Martell herein~~ ~~referred to as "Shareholder", and all three collectively referred to as "Seller", and LIQUID WASTE, INC., an Illinois Corporation, hereinafter referred to as "Purchaser".~~

WHEREAS the Company owns and operates a service business for the picking up, hauling and disposing of liquid pollutants and waste from and with businesses and companies in the Chicago Metropolitan area, both in container (Drums) and without containers (vacuum tank truck pickup), and

WHEREAS the Purchaser is engaged in the picking up, hauling and disposing of liquid pollutants and waste without containers by vacuum tank trucks in the Chicago Metropolitan area, and

WHEREAS, Seller desires to terminate its service relating to the pickup, hauling and disposing of liquid pollutants and wastes without containers presently done through use of vacuum tank trucks, and Seller desires to sell to Purchaser all their rights in and to the customer accounts of such business, and other assets, and

WHEREAS, Purchaser desires to purchase from Seller its rights to engage in said business with the customers of Seller, and

WHEREAS, Seller desires to assist Purchaser in the implementing of the transition of Sellers' customers to the use of Purchaser's services in said business,

~~NOW THEREFORE IT IS AGREED AS FOLLOWS:~~

1. Sale of Business. The Seller does hereby sell to Purchaser all their right, title and interest in and to all their customer accounts (as set forth in Exhibit "A" attached hereby and by reference made a part hereof); the goodwill of Seller's business; the exclusive right to use the trade name

"Liquid Engineering Corp."; all records pertaining to 1975 invoices, any customer lists not included herein and correspondence, files, research data and work in progress to effect an easy transition of business, customers contracts and purchase orders, customer information records and dispatch cards.

2. Exclusions. This sale does not include any cash on hand or in banks or otherwise. Nor does this sale include books of accounts or other records not named in paragraph 1, of Seller's business, but these books of account and records shall remain on Seller's premises or otherwise be available to Purchaser, for a period of six months hereafter during which time the Purchaser may inspect them for the purpose of familiarizing itself with the operation of Seller's business or to assist in causing an easy transition of Seller's service to its customer accounts to Purchaser's services to the same. Seller shall make such records available to Purchaser at reasonable times upon request by Purchaser. Nor does the sale include any accounts receivable due or owing to Seller on or before this date.

3. Present Accounts Receivable. In the event any checks or other proceeds are received by the Purchaser in payment of accounts receivable due or payable to Seller at this date, Purchaser shall immediately turn over all said checks and proceeds to the Seller in the form in which they are received. The Seller shall have the right to endorse the name Liquid Engineering Corp., or U. S. Scrap Corp., (whichever is appropriate) on all such checks and other proceeds, and deposit such checks and other proceeds in any bank account maintained by Seller.

4. Obligations of Seller. All accounts payable and other liabilities incurred by Seller up to the date hereof in the operation of its business or otherwise, are and shall solely remain the obligations of the Seller. Purchaser does not assume any of Seller's accounts payable or other liabilities whatsoever.

5. Contracts. The parties hereto do hereby acknowledge that the contracts and customer arrangements with the customers as listed on Exhibit "A" are both oral and written, however, all such contracts are cancellable by customer or Seller at will, either with notice or without notice as the case may be. Purchaser assumes the risk relating to the continuance of all contracts and customer arrangements. Further, Seller makes no

representations that these contracts and customer arrangements are assignable. Notwithstanding, the Seller, at the option of Purchaser, will undertake to notify any and all present customers of the Seller of the assignment of Seller's rights to the respective customer accounts and Seller will urge said customers to continue their liquid pollutant and waste business with the assignee, the Purchaser. All expenses incurred ~~in connection with such notification shall be borne by the Seller. The~~ Purchaser shall have the right to create and approve all written material in connection with such notification.

6. Purchase Price. The purchase price for all the assets referred to in Paragraph 1 is \$75,000.00, of which \$35,000.00 is attributable to the restrictive covenants referred to in Paragraph 7, \$30,000.00 to the customer accounts, and \$10,000.00 to good will, tradename and other intangible assets of the Seller. The sum of \$35,000.00 is payable to Seller upon the execution of this Agreement. The balance of \$40,000.00 is payable to Seller on the 6th day of January, 1977. Further, the Purchaser shall pay the Seller an additional \$25,000.00 for vacuum tank truck pick up business, attributable to the customer accounts, provided the amount of gross business done with the customer accounts as listed in Exhibit "A" within one year from this date shall be \$500,000.00 or more. The Purchaser shall pay the Seller no interest per annum on the balance remaining unpaid.

7. Restrictive Covenants. The Seller (and each of them) agrees that from the date hereof he will not (unless acting as an employee or agent of the Purchaser, or with the Purchaser's prior covenant), directly or indirectly own, manage, operate, control or participate in the ownership, management, operation or control over or in connection in any manner ~~with any business under a similar name to Liquid Engineering Corp., and~~ that for a period of three years after the date hereof Seller will not in any such manner, directly or indirectly, compete with, or become interested in any competitor of the Purchaser.

0

With reference to the Vacuum Tank Truck Pick-Up and Disposal Service, the Seller for a period of three years from the date hereof agrees that it shall not:

(a) Canvass, solicit or accept any such business from any customer accounts as set forth herein.

~~(b) Give any other person, firm or corporation the right~~
canvass, solicit or accept any business from any customer accounts contained herein.

(c) Directly or indirectly request or advise any customer account to withdraw, curtail or cancel its business with the Seller through its assignee, the Purchaser.

(d) Directly or indirectly disclose to any other person, firm or corporation the names of its customer accounts.

(e) Directly or indirectly induce or attempt to influence any employee of the Seller to not go to the employ of the Purchaser or to later terminate his employment with Purchaser.

The Seller and each of them agree that the remedy at law for any breach by any of them of the foregoing will be inadequate and that the Seller shall be entitled to injunctive relief in any Court of competent jurisdiction.

8. Liquidated Damages. In view of the difficulty of determining the amount of damages which may result to the Purchaser from a violation of any of the provisions of Paragraph 7, the Seller shall pay to Purchaser \$1,000.00 as liquidated damages for every such violation; provided, however, that the payment of such amount as liquidated damages shall not be construed as a release or waiver by the Purchaser of the right to prevent any such violation in equity or otherwise. In the event of a law suit relating to said alleged violations resulting in a judgment in favor of the Seller or in favor of the Purchaser, the losing party shall pay the other party reasonable attorneys fees not to exceed \$1,000.00 in each such law suit.

9. Telephone Numbers. The Seller shall cause the immediate transfer of the telephone numbers used by Liquid Engineering Corp., specifically, 941-9180-1 & 2, 928-0700 and 928-0701 for the use of the Seller. Further, the Seller upon receiving any calls relating to the customer accounts

or any other messages, calls, notifications and announcements from the customer accounts, or relating to the Vacuum Tank Truck Pick-Up Service of Seller, shall immediately notify Purchaser of the same; and when appropriate Seller shall provide such caller or other persons with the proper telephone number and address of Purchaser.

10. Rights of Action. The Seller does hereby transfer and assign, as part of the consideration hereunder, any and all rights of action, cause of action, rights of damages it may have against Waste Management, Inc., or any of its subsidiaries or divisions for any violation of the law relating to the customer account known as Rexene Polymers Co., a Division of Dart Industries, Inc. Purchaser shall have the right to commence any legal action against said Waste Management, Inc., its subsidiaries or divisions as the Purchaser may deem proper and the Seller shall cooperate with Purchaser in the prosecuting of this action and the obtaining of information and the giving of testimony in Court or otherwise. All expenses and costs incurred in such litigation shall be solely borne by the Purchaser. Purchaser shall be responsible for all actions taken in said litigation and the Seller shall act as a witness, transmitter, of information and custodian of materials, and not as a litigant.

11. Employee. It is the intention of the Purchaser to hire Frank Brown as a salesman for the Purchaser. Seller agrees that it will urge Frank Brown to join the employ of Purchaser and that Seller shall terminate Frank Brown from its employ this date and warrants that it will not rehire Frank Brown in any capacity for a period of one year from the date hereof.

12. Seller Warranty. The Seller, and each of them, hereby warrants the following:

(a) That the Company (and each of them) is an Illinois Corporation, presently in existence and in good standing;

(b) The Company has good and marketable title to all its properties and assets as set forth in Paragraph 1;

(c) That they have no knowledge or reasonable grounds to know any litigation, proceeding, or governmental investigation pending or threatened against or relating to the Seller, its properties or business, which will effect, encumber or diminish the assets or rights to the assets as transferred hereunder;

(d) That all proceedings, meetings and resolutions required by law or by the provisions of this Agreement to be taken by the Seller, its Shareholders and Board of Directors in connection with the transactions provided by this Agreement, have been duly and validly taken;

(e) Seller has complete and unrestricted power to sell, transfer and deliver to Purchaser all of the assets, business, goodwill and other property sold hereunder, and the instruments executed, delivered, and to be executed and to be delivered, to the Purchaser hereunder are valid in accordance with terms and effectively vest in the Purchaser good and merchantable title to all said assets transacted in this Agreement, free and clear of any and all obligations, liabilities and encumbrances.

13. Resolutions. Seller shall provide Purchaser with certified copies of resolutions from the Board of Directors and Shareholders of the Company consenting to and assigning the assets and properties which are the subject of this transaction.

14. Benefit. All the terms of this Agreement shall be binding upon and inure to the benefit of, and shall be enforceable by, the respective legal representatives, successors and assigns of the Seller and Purchaser.

Steve Martell
U. S. Scrap Corporation
BY Steve Martell, President

15. Notice. All notices, requests, demands and other communications hereunder shall be in writing and shall be deemed to have been duly given if delivered or mailed first class, postage prepaid (a) if to the Seller, at P. O. Box 27151, Riverdale, Illinois 60627, or (b) if to the Purchaser, at 39 South La Salle Street, Suite 210 Mr. Jack E. Charron, Chicago, Illinois 60603.

16. Enforceability. In the event any provisions or sub-paragraphs of this Agreement shall be void as against public policy or unenforceable, in whole or in part, it shall be deemed not to affect or impair the remaining portions of this Agreement. Further, each and every paragraph, term and condition contained in this Agreement is made separately and is hereby declared and agreed to constitute a separate distinct promise and covenant.

A NOTE HAS BEEN ISSUED CONCERNING THE \$46,000 - BALANCE HERE -

IN WITNESS WHEREOF the parties hereto have duly executed this Agreement:

Attest:

Secretary

LIQUID ENGINEERING COMPANY

BY Steve Martell

Attest:

Secretary

U. S. SCRAP CORP.

BY Steve Martell

Steve Martell
STEVE MARTELL, Individually

Attest:

James L. Joseph
Secretary

LIQUID WASTE, INC.

BY John Joseph
PRES.

The undersigned acknowledges the assignment of this agreement and the proceeds hereunder to Riverdale Bank.

LIQUID WASTE, INC.

BY John Joseph
President

	CUSTOMERS	DISTANCE MILES	PRODUCT TYPE	PRICING	1975 to 11/31/75
1	Clark Equip.	51	oil	.06	4090
2	Don/arin Moore	32	solvent	.06	4552
3	Brightly Galvanized	48	acid	.07	7348
4	Industrial Chrome	53	acid	.08	2253
5	Chem Products	5	chemical	.09	405
6	Miller Prepared Potatoes	60	food	.06	660
7	Etc-Graphics	35	solvent	200 min.	200
8	Alcont Plating	54	acid	.07	540
9	Small Co.	30	acid	300 min.	4600
10	Five Industries	30	acid	.07	141
11	Victor Products	3	chemical	200 min.	400
12	Lyran Gordon	67	acid	.07-1/2	1763
13	Precision Twist	30	acid	300 min.	3300
14	Food Packer	5	food	.06	15768
15	Clark Oil	17	oil	.06	41727
16	Institute of Gas	35	chemical	300 min.	23052
17	Midwest Brass	5	acid	300 min.	2100
18	Devitt Tube	47	acid	.07	2274
19	Spot Mills	13	oil	.10	6830
20	Republic Steel	18	acid-tar	.10 & .04	13258
21	Devitt Tube	18	acid	.04 3/4-.05	57422
22	Kitchens of Paradise	18	food	.04 1/2	33057
23	International Foods	18	food	.07	4529
24	Acme Chem.	40	acid	250 min.	6350
25	The Collis Co.		acid	.20	7700
26	Acme	43	chemical	.05	107715
27	Enterprise Wire	4	acid	.04 1/2	14365
28	Proplan Pain	20	solvent	.05	12215
29	Pyoth Lab.	40	chemical	.06	425
30	Wandercock		oil	.07	408
31	Cott	32	chemical	.06	120
32	Exic-Midway	16	acid	150 min.	1050
33	E.A. Briggs	53	solvent	150 min.	2475
34	National Precision	35	acid	.08	3940
35	Libby, McNeill & Libby	6	food	.06	6686
36	Hendrickson Mfg.	30	oil	.06	350
37	Hills McCanna	60	oil	.06	6120
38	McLean Forge	60	oil	.05	6485
39	Martin Connor	20	solvent	.05	3925
40	Wilson Steel	38	acid	.06	2730
	Chgo. Steel & Wire	11	acid	.05	5550
	Chgo. Sheepskin Products	20	chemical	.05	9650
	Whiting Corp.	4	oil	.06	750
	Provised Plating	25	hydroacid	.06	774
	Libbard Corp.	20	chemical	.04 1/2	2532
	Hot Joint	.	oil	.06	760
	Pyoth Lab.	32	chemical	.04	2420
	International Harvester	4	acid	.05	16740

(A division of
Austin Western (Clark Equip.)

Chrome rite

Container Corp. of America

Crown Cork & Seal

DeSoto, Inc.

Elkwood Plating

Graph-On

Hall Printing

Industrial Hard Chrome

Libby, McNeil & Libby

Midwest Plating

Midwest Brass Forgings

National Can Corp.

Niles Park Dist.

Republic Steel

Thor Power Tools

Jet Die Casting

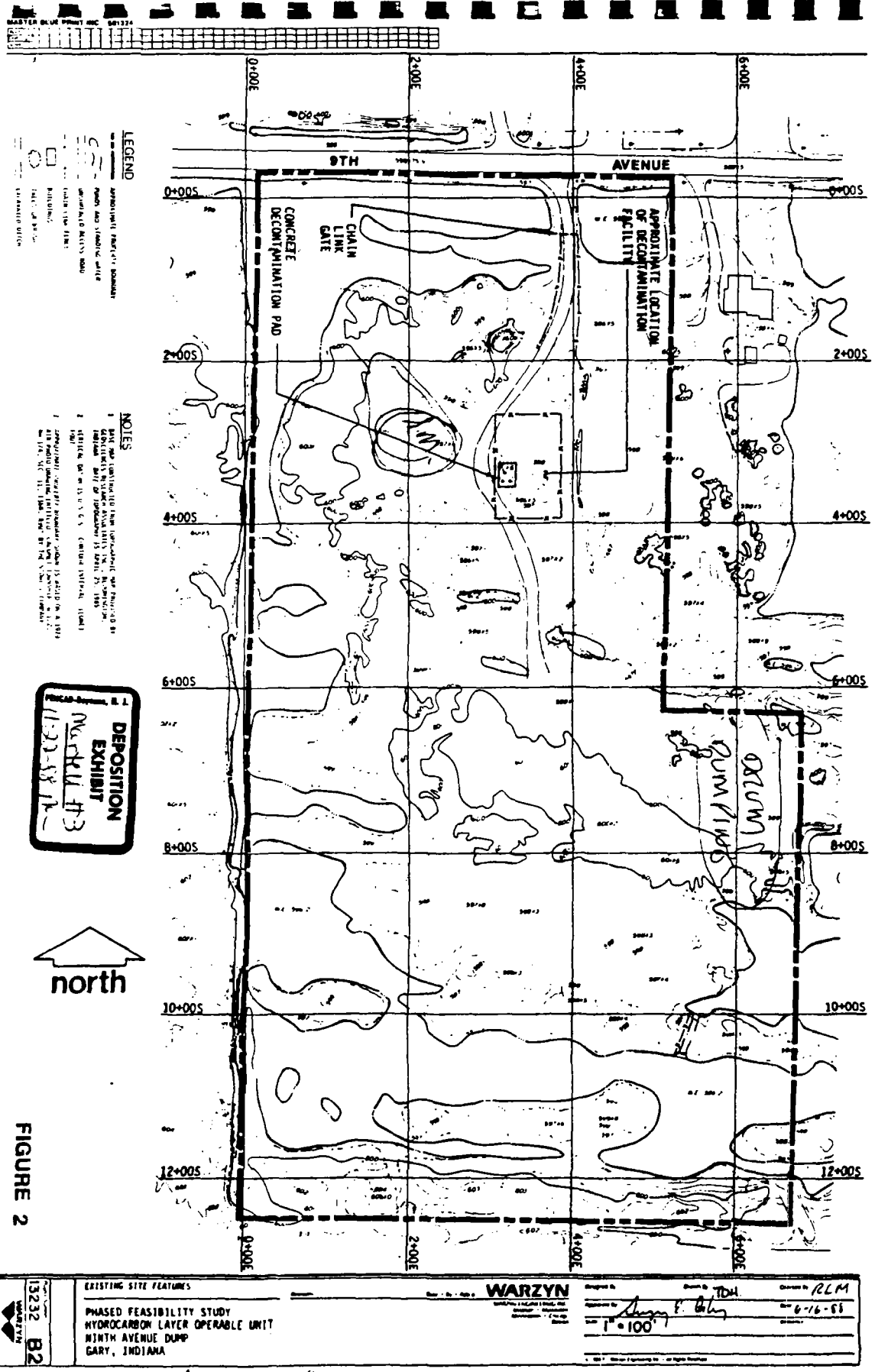
Arnold's Engineering

Perk Foods Co.

Pittsburg Metals

Sun Chemical (Lyons) *LLC*

Belmont Plating



Ninth Avenue Dump

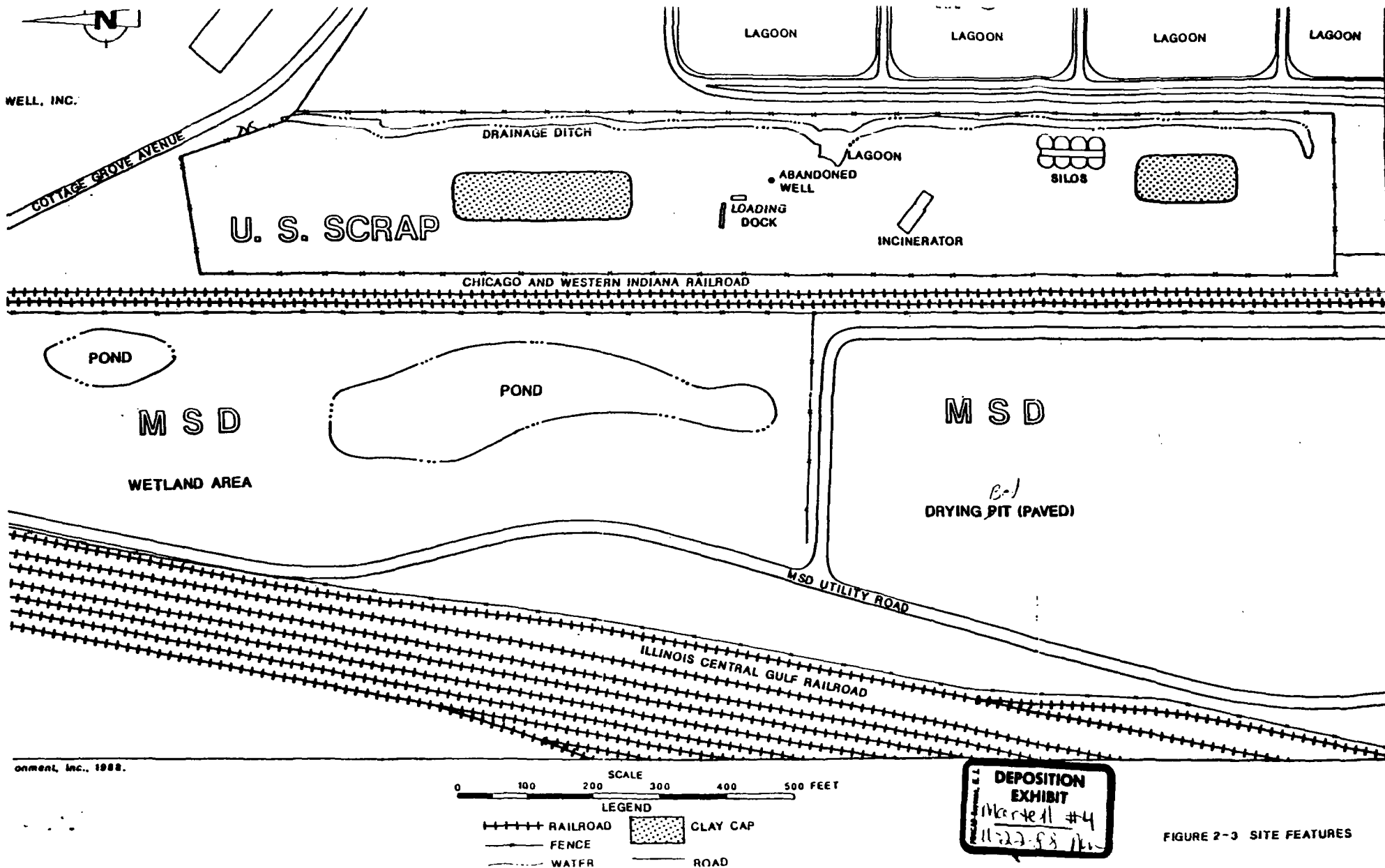


FIGURE 2-3 SITE FEATURES

2001 THANK TO COMA NOW

35⁰⁰ De Head

	CUSTOMER	FIRST PRICE	PRICE	SERVICE STARTED	DATE RAISED	
1	Occultronics	225.00	1.0		1/23/74	1
2	Allis Chalmers	2.20				2
3	American Can - Western	3.60	4.25		10/1/73	3
4	" " Hammond	3.60	4.25		10/1/73	4
5	" " Maywood	3.60				5
6	" " Barrington	6.00			1/23/74	6
7	American Nameplate	4.50		9/19/73		7
8	American Rivet	5.00		9/17/73		8
9	Anderson Mfg	5.00		9/18/73		9
10	John & Armitage	5.00		8/15/73		10
11	Asland Chem - Cal City	4.00	5.00		10/1/73	11
12	Aven	4.00		9/4/73		12
13	Barrett Varnish	4.00		1/25/73		13
14	Boltrmaster	5.00		11/30/73		14
15	Boyer, Schultz	4.00		4/13/73		15
16	Carroll	4.00		1-9-74		16
17	Celofilm	3.00	5.00	5-3-73	4-1-74	17
18	Chgo Adhesive	3.80	5.00		10-1-73	18
19	Chgo Decal	3.00	5.00		10-1-73	19
20	Chgo Nameplate	4.00	5.00		10-1-73	20
21	Chgo Roto Print	4.00		12-21-73		21
22	Clark Oil	3.00				22
23	Commander Pkg	5.00	7.00		10-1-73	23
24	Cont'l. Can - 6540	3.60	4.25		10-1-73	24
25	" " Kilpatrick	3.60	4.25		10-1-73	25
26	Counter Saw	5.00		3-19-74		26
27	Cook County Hosp	100.00	100.00	6-14-73		27
28	C.P. Close	7.50		7-5-73		28
29	De Soto Kottres	3.00	4.00		1-1-74	29
30	" H to	3.00	4.00		1-1-74	30
31	E.E. Donnelly	5.00	6.00		1-1-74	31
32	Ecco Products	4.00		7-27-73		32
33	Elger Machine	5.00		7-30-73		33
34	Ind. Bldg & Plastics	5.00		6-28-73		34
35	Flinx	3.50			4-1-74	35
36	For Malley	4.00		7-23-73		36
37	Furnas	3.00	6.00		5-1-74	37
38	C.P. Hall	10.00		3-7-73		38
39	Heritage Ink	4.00		1-15-73		39
40	Howell	4.00		3-24-73		40

DEPOSITION EXHIBIT

11-21-88

CHECK LAST DAY OF month

	1	2	3	4
1	J. M. Huber	4.00	5.00	10-1-73
2	Hygrade Foods	4.00	3.25-73	
3	D'Aglio	4.00	5.00	10-1-73
4	K.M.S. Co.	5.00	12-27-73	
5	LA SALLE NAT'L BANK	100.00 mn	150.00	
6	M ^c WHORTER Chem	4.00	8-23-73	
7	Mobil Oil - Cicero	4.00	5-25-73	
8	Modine Mfg	4.50	7-25-73	
9	MORTON Chem Ringwood	13 th 5.00		
10	" " Elk Grove	3.50		
11	Narnaco	5.00	9-7-73	
12	Nat'l. Can 51st	4.00	5.00	10-1-73
13	" " Melrose PR	3.00	4.00	10-1-73
14	" " Kedzie	8.00	4.00	10-1-73
15	" " La Porte	4.40	3-1-73	
16	Pierce, Stevens		1-9-73	
17	Poncher Ind	5.00	8-2-73	
18	Rauland	3.00	4.00	1-1-74
19	Richardson Graphico	4.00	9-5-73	
20	R-2 te	5.00	9-21-73	
21	Ruotileum		5-8-73	
22	Reflector Hardware	4.00	5.00	10-1-73
23	Schmidgall	5.00	8-27-73	
24	Scholle	4.00	5.00	10-1-73
25	Shakproof	4.50	2-1-74	
26	Shil	4.00	4-11-73	
27	Size Control	4.00	5-10-73	
28	Standard T. Federal	3.60	4.25	10-1-73
29	" " H to	3.60	4.25	10-1-73
30	Sommer Maca	5.00	8-1-70	
31	Sun Chem 712	3.00		
32	Thiele - Engdahl	3.25	5.00	2-28-74
33	U.S. Steel Prods.	3.00		9-27-73
34	U.P.S.	100.00 mn	8-20-73	
35	Valcical	5.00	6.00	10-1-73
36	Victor Basket	4.00	8-20-73	
37	Wilson Sporting Goods	5.00	7-17-73	
38	Wm Wrigley	5.00	7-17-73	
39	Unimoyal	5.50	6.50	
40	Sun Chem - Lycra	3.00	3-1-73	

		1	2	3	4
1	Union Camp	4.00		2-20-73	1
2	Xerox	100.00 min		3-8-74	2
3	Ball Bronze	3.00	4.00		10-4-73
4	Pyle Nalk			4-15-74	4
5	Chao Metals	1.50		74	5
6	Armstrong Chem	4.00		6-21-73 only	6
7	Bag Kraft	3.00		8-9-73	7
8	Bratford mfg			3-14-74	8
9	B+T Plastics	5.00		7-25-73 only	9
10	Central Scientific	100.00 min		8-9-72 only	10
11	Chem - Trust	4.00		11-17-73 only	11
12	Conservative Chem			11-25-73	12
13	C.P.C. INTER'L	4.00		3-23-73	13
14	Croname	200 MT		6-4-73 only	14
15	Deso. Ind	100.00		8-10-73	15
16	Elliot Paint	3.50		10-6-73 only	16
17	Felt Prods	100.00 per load		9-20-73	17
18	Gard. Ind	3.00		11-2-73	18
19	Graph On	100 min		6-8-73	19
20	Harinal	3.00		1-3-73	20
21	Hawmer Hard Chrome	10.00		7-16-73	21
22	Heatlath	6.00		12-21-73	22
23	J+S Turmill	3.00		5-21-73	23
24	Mazo + Haldston	100.00 min		7-10-73	24
25	Mcwest Elec	5.00		1-8-73	25
26	Mirror Reflector			8-1-73 only	26
27	Nat'l Bronze	100 min		3-27-73	27
28	Northwest Screen Print	4.00		4-5-73	28
29	Northwestern Univ	100.00 per load		5-3-73 only	29
30	Owens Corning	4.00		10-2-73	30
31	Rock-Ola	5.00		8-2-73	31
32	Rohm + Haas	4.00		9-29-73	32
33	Rollgunt Pkg Diado	200.00 min		12-20-73	33
34	Specialty Cooling	5.00		10-24-73	34
35	Stauffer Chem	5.00		11-13-73	35
36	Transport Service	5.00		9-1-73	36
37	Pen. Co	5.00		6-30-73	37
38	Triple B Etchants	3.85		6-29-73 only	38
39	Wilson & Co	400.00 per load		5-9-73	39
40	Wyco Tool	4.00		6-25-73	40

5804 - Blue
5804 - Green

01D

		1	2	3	4
	CUSTOMER	PRICE	YEAR		
1	Abbot Lab	4.00	71-72		1
2	Advance Transformer	3.00	71		2
3	Alco - Gravure	3.00	5-70		3
4	Betz Lab	3.00	72		4
5	Big Ben	3.00	69		5
6	Cabinet Screw Machine	3.00			6
7	Central Solvent	2.50	69		7
8	Cumec Solvent	11.00	69		8
9	De Mart + Dougherty	3.00	7-1-70		9
10	Elidden Co	4.00	70		10
11	Handschy Chem	3.00	69-70		11
12	Hooker Glass	3.00	70		12
13	Bruce Horn	3.00	70		13
14	Kerr Chem	5.00	69		14
15	Beverly Duw	3.50	70		15
16	Lumina Ceiling	4.00	71		16
17	Moffet Tech Center	4.00	73		17
18	Natl Celofilm	6.00	70		18
19	Parsky Prods	2.00	70		19
20	P.P.G. Inc	5.50	72		20
21	Reliable Eng	4.00	69		21
22	Reino Solvents	5.50	69		22
23	Sinclair + Val	5.00	71		23
24	Sigoli Plating	5.00	69-70		24
25	Slusht Chem	2.00	69		25
26	Western Etc	2.90	70		26
27	Young Spring + Wire	3.50	71		27
28					28
29					29
30					30
31					31
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35					35
36					36
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39					39
40					40

8604 - Green

Sales for May 1975

21

		1	2	3	4
1	Apco	5-7	11450	11450	
2	Capo Roto Print		11451	11451	
3	Chgo Sheepskin		11452	11452	
4	Chgo Steel Wire		11453	11453	
5	Fiberboard		11454	11454	
6	Libby		11455	11455	
7	Martin Jensen		11456	11456	
8	Nat. Can Corp		11457	11457	
9	Natl. Prec. Cir.		11458	11458	
10	Premium Paint		11459	11459	
11	Regal Tube		11490	11490	
12	Size Control		11491	11491	
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4191-

Check List

		1	2	3	4	5	
G. cat.		Date	Invo.	7 mt.	daily 7 mt.		
Bretford Mfg	Cage Steel wire	4-14	11255	100-			1
	Clark Oil		11309	450-			2
	Intalake		11326	100-			3
	Regal Tube		11293	331-			4
	Republic Steel		11346	2048-			5
Skill Corp.	Xerox		11299	350-			6
			11151	225-			7
			11316	100-		3752-	8
							9
De Soto		4-15	11335	349-			10
Hills - M: Penna			11147	240-		539-	11
Contl. Can		4-16	11147	19125			12
Inland Steel		4-16	11230	314250			13
Intl. Harv.		4-16	11261	325-			14
Jet Die Casting		4-16	11278	200-			15
Motive Ind		4-16	11213	300-			16
Motive Ind		4-16	11050	420-			17
Motive Ind.		4-16	10947	300-			18
Natl Can L.P.		4-16	11222	46875			19
Rustolum		4-16	11337	416-			20
Spot Hails		4-16	11317	240-			21
Uniroyal		4-16	11241-11302	179850			22
US Steel Corp.		4-16	11321	355-		3357-	23
Penn-Dixie Steel		4-17	11211	1377-			24
Sun Chem Corp.		10949-11150-11200		99650		238450	25
W F Hall		4-15	11150	573-			26
Clark Oil			11342	247941			27
Libby			11354	200-			28
Pres. Twist Drill			11339	300-		355261	29
							30
							31
							32
							33
							34
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Check List

	1	2	3	4
1	Midwest Wrecking	5-12	2000-	
2	Brendenburg Crm.		100-	
3				
4	Benj Moore	11462	200-	
5	Carpent	11463	300-	
6	Q.P. Clare	11461	221-	
7	Duffman Int	11255-77	575-	
8	Intl Harv.	11371	325-	
9	Libby	11437	100-	
10	Madge	11469	500-	
11	Rexene	11444	9205-	
12	Spot Nails	11430	250-	11,652-
13				
14	It Tool Wks	5-13	140-	
15	Brighty Gal.	11433	245-	
16	Libby	11465	100-	
17	Coatl Cleaning		250-	not in
18	Reflector Hardware	11239	355-	540
19				
20	Colligan	5-14	11432	14550
21	Regal Tube	11473	475-	
22	"	11415-29-35-37-41-41	7042 50	7566-
23				
24	Commercial Sol	5-15	11446	250-
25	Motive Ind	11341	400-	
26	Intl. Prec. Cir.	11426	160-	532-
27				
28	Charles Mil	5-16	11453-51	634217
29	Intl. Harv.	11375	315-	
30	Wyman Gordon	11377	505-	79925-
31				
32				
33				
34				
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#2

305.00 +
740.00 +
783.00 +
2594.25 +
3347.00 +
2130.00 +
14399.25 *

5

April 1975

3

4

1 Amer. Can -
2 Benj Moore
3 Boyle Midway
4 Expo Sheepskin
5 Drexlan PT
6 Howell & Co.
7 Libby's McNeill
8 Magna Chem.
9 Maclean Fagg
10 Morton Chem.
11 Natl Can Corp

13 R. J. Briggs
14 Drexlan PT
15 Hendrickson Mfg.
16 Inst. Flav.
17 Libby's McNeill
18 Morton Chem.
19 Natl Can L.P.
20 Palsival Chem.
21 Venus Lab.

23 Chrome Rite
24 Culligan
25 Inst. Multi Foods
26 Morton Chem.
27 Shaveproet div.
28 Verco

4-17
4-17

4-15
4-15

11350	1173-	
11351	2910-	
11352	150-	
11353	175-	
11354	175-	
11356	200-	
11357	100-	
11357	250-	
11359	250-	
11390	54950	
11391	200-	2322.50
11392	150-	
11393	200-	
11394	270-	
11395	325-	
11396	100-	
11397	472.50	
11398	240-	
11399	75-	
11400	140-	1975.50
11401	175-	
11402	145.50	
11403	245-	
11404	250-	
11405	34650	
11406	600-	1225-

5079.00 +
 100.00 +
 5079.50 +
 1210.00 +
 1558.00 +
 10538.50 *

Check List

	1	2	3	4	5
1	Cargill	4-21	11350	342-	
2	Rau land	11255-35-21-	11124	1077-	
3	Republic Steel		11333	520-	
4	Std T Chem		11319	390-	2629-
5					
6	Libby	4-22	11372	100-	100-
7					
8	Intl Harv.	4-23	11250	325-	
9	Sara Lee		11322	459450	
10	Republic Steel		11361	160-	57950
11					
12	Chgo Sheepskin	4-24	11257-96-1503	675-	
13	Morton Chem.		11314	355-	
14	Republic Steel		11375	150-	1210-
15					
16	Braj Mowc	4-25	11351	200-	
17	Ind Hard Chrome		11370	312-	
18	Libby		11357	100-	
19	Maclean		11264	225-	
20	Magee		11357	250-	
21	Uniroyal		11291	451-	1505-
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Chemical Sales

April 1975

	1	2	3	4
1	Chgo Sheet Pile	4-22	11407	375-
2	Chgo Steel + Wire		11408	450-
3	Decblan PT		11409	200-
4	Intl Harvester		11411	325-
5	La Salle Mgmt.		11412	150-
6	Libby McNeill		11413	100-
7	Maclean Fogg		11414	250-
8	Regal Tube		11415	119250
9	Univ. gal		11416	557-
10				3699.50
11	Martin Senour PT	4-24	11419	575-
12	Republic Steel		11417	200-
13	Hat-Lan Corp.		11415	200-
14	Martin Senour PT		11420	585-
15				2100-
16	R.P. Clave	4-25	11421	221-
17	Cigo Auto Hint		11422	238-
18	Decblan PT		11423	125-
19	Libby		11424	100-
20	Ma. Inc Chem		11425	250-
21	Hat. Pice. Lis.		11426	100-
22	Morton Chem		11427	425-
23	Martin Senour PT		11428	200-
24	Pittsburgh Metals		11422	315-
25	Regal Tube		11429	2230-
26	Spot Nails		11430	250-
27	Son Chem		11431	19975
28				4733.75
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35				
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money paid in check list

5798.50
775.00
703.00
4296.50

		date rec'd	Inv. #	amt	Total	
		4-28	11350	1373-		1
	Clark Equip		11349	150-		2
	Collis		11243	700-		3
	Leavitt Tube		11355	815-		4
	Mayer Chem		11355	250-		5
	Hotl Van	11237-67-54-95-11315	2543-			6
	Dati Proc Cir.		11359	160-		7
	Regal Tube	11360-94	110250		6775.50	8
						9
	Liberto Culver	4-29	11347	100-		10
	Chrome Rite		11401	175-		11
	Introlave		11331	300-		12
	Libby		11396	100-		13
	Xerox		11404	100-	775-	14
						15
	RQ Briggs	4-30	11392	150-		16
	Onco Steel & Wire			570-		17
	Sea Chem		11334	543-		18
	Venus Lab.		11303	140-	1703-	19
						20
						21
						22
						23
						24
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		1	2	3	4
1	Brightly Cal.	4-29	11433	245-	
2	Direblan		11434	200-	
3	Chgo. Sheepskin		11435	175-	
4	Intl. Harvester		11436	325-	
5	Libby McNeill		11437	100-	
6	Regal Tube		11438	720-	
7	" "		11439	35250	
8	" "		11440	675-	
9	" "		11441	132250	4645-
10					
11	Grand Honor	4-30	11476	540-	
12	Motive Ind		11475	630-	
13	Rustolium		11474	820-	
14	Regal Tube		11473	675-	
15	Rauland		11472	35550	
16	Pierre + Stevens		11471	375-	
17	Direblan PT		11470	200-	
18	Morton Chem.		11471	426-	
19	Magre Chem.		11469	250-	
20	Libby McNeill		11468	100-	
21	Intl Harv.		11467	325-	
22	General Electric		11466	240-	
23	Chgo Roto Print Co.		11464	225-	
24	Cargill		11463	306-	
25	Benjamin Moore		11462	200-	
26	Midwest Brass		11453	300-	
27	Precision Twist		11457	300-	
28	Richards of Sara Lee		11455	3960-	
29	Enterprise Wire		11454	1360-	
30	Clark Oil		11449	200-	
31	" "		11451	102430	
32	" "		11453	581777	
33	Uniroyal		11445	494-	
34	McWhorter Chem.		11446	552-	
35	Natl. Can		11447	200-	
36	Richardson Graphics		11448	292-	
37	Rexone		11446	9205-	29,175.5

Check List

			3	4	5	
1	Morton Chem	5-1	11390	549 -		1
2	Intl Harv.		11311	325 -		2
3	Specified Altg		11237	264 -		3
4	Wyer Tool		10850	156 -	✓ 6294.50	4
5						5
6	Dreelan Pt	5-2	11233	200 -		6
7	Ill Tool Wks			346.50		7
8	La Salle Mgmt		11412	150 -	✓ 696.50	8
9						9
10	Penix-Dixie	5-5	11324	242 -		10
11	Intl Harv.		11354	325 -		11
12	Libby		11413	100 -		12
13	U S Steel		11343	155.50	✓ 2142.50	13
14						14
15	Boyle Midway	5-6	11352	150 -		15
16	Chgo Sheepskin	11407-11351-63-53		700 -		16
17	Midwest Brass		11458	300 -	✓ 1400 -	17
18	Spot Hails		11376	250 -		18
19						19
20	Libby	5-7	11424	100 -		20
21	Republic Steel		11417	200 -		21
22	Velsicol		11399	78 -	✓ 378 -	22
23						23
24	Contl. Can	5-8	11365	131.75		24
25	Aprco		11198	198 -	✓ 329.75	25
26						26
27						27
28						28
29						29
30						30
31						31
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1	Yenus Lab.	5-12	11509	75 -	
2	Scott Inc.		11503	120 -	
3	Perok		11507	100 -	
4	Pelical		11506	100 -	
5	Univocal		11505	51350	
6	Stein Hall		11504	750 -	
7	Scholle		11503	320 -	
8	Magee		11501	250 -	
9	Libby		11500	100 -	
10	Intl Harv.		11497	325 -	
11	Dreelan Pt		11475	220 -	
12	Dreelan Pt		11477	150 -	
13	Island Chem.		11474	335 -	
14	Brightly Gal.		11475	250 -	
15	Chgo Pato Print		11496	250 -	
1	Regal Tube		11493	317250	7075 -
18	Clark Equip.	5-15	11510	350 -	
19	Imer Can		11511	25050	
20	RA Briggs		11512	150 -	
21	Chgo Sheepskin		11513	175 -	
22	Gull's		11514	700 -	
23	Dreelan Pt		11515	200 -	
24	Howell		11516	120 -	
25	Ind Hard Chrome		11517	144 -	
26	Intl Harv.		11518	325 -	
27	La Salle Mgmt.		11519	150 -	
28	Libby MacNeill		11520	100 -	
29	Natl Can		11521	225 -	
30	Regal Tube		11522	925 -	
31	Republic Steel		11523	200 -	4224.50
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UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION V

IN THE MATTER OF:)

U.S. SCRAP CORPORATION,)
Chicago, Illinois,)

-and-)

9TH AVENUE DUMP,)
Gary, Indiana.)

The discovery deposition of LEROY BROWN,
taken in the above-entitled cause, before Charles R.
Zandi, C.S.R., a Notary Public within and for the
County of Cook and State of Illinois, at
111 West Jackson Boulevard, Suite 300, Chicago,
Illinois, on September 9, 1988, at the hour of
1:30 o'clock a.m.

BAKER, FENNELL & ASSOCIATES, INC.

188 W. RANDOLPH ST., SUITE 2599

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REPORTED BY: CHARLES R. ZANDI, CSR

1 APPEARANCES:

2 U.S. EPA, REGION V

3 BY: MR. EDWARD J. KOWALSKI

4 MR. MARK THOMAS

5 230 South Dearborn Street, Suite 2600

6 Chicago, Illinois 60604

7 Appeared on behalf of the
8 Environmental Protection Agency;

9 THOMAS D. DECKER & ASSOCIATES, LTD.

10 BY: MR. THOMAS D. DECKER

11 135 South LaSalle Street, Suite 1527

12 Chicago, Illinois 60604

13 Appeared on behalf of the Deponent.

14 * * * * *

15 I N D E X

16 EXAMINATIONS

17 PAGE

18 WITNESS: ROBERT THOMPSON

19 Examination by Mr. Kowalski

20 3

1 MR. KOWALSKI: Swear in the witness.

2 (Witness sworn.)

3 MR. KOWALSKI: For the record, this will be the
4 deposition of Mr. Leroy Brown, taken pursuant to a
5 subpoena issued under the authority of Section
6 122(e)(3)(b) of the Superfund Amendments and
7 Reauthorization Act.

8 LEROY BROWN,
9 called as a witness herein, having been first duly
10 sworn, was examined and testified as follows:

11 EXAMINATION

12 BY MR. KOWALSKI:

13 Q Mr. Brown, I'm going to be asking you some
14 questions today about two sites we're currently
15 investigating. One is called the U.S. Scrap site,
16 and that's located at approximately 122nd Street and
17 Cottage Grove in Chicago. Are you familiar with
18 that?

19 A Yeah.

20 Q Okay. So, when I say the U.S. Scrap site,
21 that's the site I'll be talking about. Okay?

22 A Okay.

23 Q The other site we'll be talking about is --
24 I'll term the 9th Avenue Dump or 9th Avenue site,

1 and that's located at approximately 9th and Cline
2 Avenues in Gary Indiana. Okay? Are you familiar
3 with that site, too?

4 A Yeah, I am.

5 Q Okay. The court reporter here will be
6 taking down your testimony on his machine; and in
7 order for him to do that, you have to keep all of
8 your responses out loud. Okay?

9 A Okay.

10 Q Sometimes we have a tendency to nod our
11 head yes or shake it no. He can't take that down.

12 A Okay.

13 Q And if you don't understand any of my
14 questions or if you want to take a break at any
15 time, just let me know, and I'll be happy to
16 accommodate you.

17 Mr. Brown, could you tell me your current
18 address.

19 A Now?

20 Q Yeah.

21 A 10722 South Champlain.

22 Q And that's in Chicago?

23 A Yeah.

24 Q Is that a house or an apartment?

1 A House.

2 Q Does anyone live there with you?

3 A I live with my sister.

4 Q And what's her name?

5 A Daisy Jones.

6 Q Do you currently have any plans on moving
7 away from there in the near future?

8 A No.

9 Q And what's your phone number there?

10 A 568-2669.

11 Q Are you currently employed?

12 A No, I'm retired.

13 Q And that was within a matter of the last
14 couple of weeks?

15 A Yeah, I retired. I come out -- what was
16 it -- August the 23rd.

17 Q And when you retired, where were you
18 working?

19 A I worked for Stryker International.

20 MR. DECKER: How do you spell Stryker?

21 MR. KOWALSKI: That's S-t-r-y-k-e-r.

22 MR. DECKER: Tryker?

23 MR. KOWALSKI: Stryker.

24 MR. DECKER: S-t?

1 MR. KOWALSKI: Yeah.

2 BY MR. KOWALSKI:

3 Q And how long did you work for Stryker?

4 A Well, Stryker started in '79.

5 Q And prior to that, where did you work?

6 A Well, let's see. It would have been U.S.
7 Drum.

8 Q When you worked for Stryker, did you work
9 at the Paxton landfill?

10 A Yeah.

11 Q And when you worked for U.S. Drum, where
12 did you work?

13 A Let me see. 135th and Oglesby.

14 Q And that's here in Chicago?

15 A Yeah.

16 Q And how long did you work there?

17 A Well, we were there, I'd say, about -- I
18 guess about two years.

19 Q And prior to working at U.S. Drum, where
20 did you work?

21 A I worked for U.S. Scrap.

22 Q And was that the site at approximately
23 122nd and Cottage Grove?

24 A Right.

1 Q Okay. What was your position or job at
2 U.S. Scrap?

3 A Truck driver.

4 Q Can you tell me when you first went to work
5 for U.S. Scrap?

6 A Well, that would have to be about -- I'd
7 say -- the job was '61.

8 Q Did you work at something else there before
9 you were a driver?

10 A Yeah, I was a laborer, like a helper around
11 the yard there.

12 Q How long were you a laborer?

13 A That would have to be when I first
14 started -- must have been about '59. I'd say more
15 like '58.

16 Q So, between '58 and '61, you generally
17 worked as a laborer there?

18 A Yeah.

19 Q Would that be at the 122nd and Cottage
20 Grove site?

21 A No. That would be in Argo.

22 Q That would be in Argo?

23 MR. KOWALSKI: That's A-r-g-o.

24

1 BY THE WITNESS:

2 A We was in Argo from about '58 to about '62
3 we moved to the city.

4 BY MR. KOWALSKI:

5 Q So, in '62, you first moved to the site
6 there at 122nd and Cottage Grove?

7 A Yeah.

8 Q And how long did you stay at the 122nd and
9 Cottage Grove site?

10 A Well, I think it was about -- we moved out
11 of there in '75.

12 Q Okay. During that period from '62 to '75,
13 did you work as a truck driver?

14 A Yeah.

15 Q And during that entire period of time,
16 would you go pick up liquid waste from various
17 companies and take them back to that site?

18 A Yeah.

19 Q At some time during your work as a truck
20 driver, did you also take waste to the 9th Avenue
21 site?

22 A Yeah.

23 Q Okay. Can you tell me when you first
24 started taking waste there?

1 A Near as I can remember, it had to be about
2 '74, as near as I can remember that site.

3 Q Was waste taken to that site before you
4 started taking it there?

5 A Yeah. Some of the other drivers, they'd
6 been there before I started.

7 Q Okay. Do you know when that site, the
8 9th Avenue site, first started accepting waste?

9 A No, I really don't.

10 Q And do you know when you stopped taking
11 waste to that site?

12 A Well, I would -- the near as I can come to,
13 that would have to be about -- about '77. Yeah,
14 that would be about -- that's the nearest I can
15 remember, '77 something.

16 Q Sometimes you can recall time periods by
17 connecting them with a specific event, either going
18 on in the world or in your own life.

19 A Well, the reason I say about '77, that's
20 when all the drivers got laid off, so we only had a
21 couple of drivers left. And then he was going out
22 of chemical. We had quit hauling chemicals, see.

23 Q So, the use of the 9th Avenue site ended
24 sometime around the time the drivers were laid off

1 because the chemical hauling business was going
2 down?

3 A Yeah.

4 Q And during this time period when you would
5 take waste to the U.S. Scrap site and the 9th Avenue
6 site, you were employed by U.S. Scrap Corporation,
7 is that right?

8 A Yeah.

9 Q Could you describe for me generally the
10 facilities that were at the U.S. Scrap site during
11 the time you would drive there?

12 A Well, they had a burner they called it.

13 Q A burner?

14 A Yeah. And then they -- the hole where they
15 dumped the waste into.

16 Q Was there one -- one hole or more than one
17 hole?

18 A Well, near as I can remember, one hole.
19 But, you know, like -- yeah, one hole. We used to
20 put it inside there, and it kept filling up.

21 Q The site ran along some railroad tracks, is
22 that right?

23 A Yeah.

24 Q Okay. And it ran lengthwise north and

1 south, would that be accurate?

2 A Yeah.

3 Q Okay. And would you -- when you came in
4 with the truck, would you come in from the north end
5 of the site or the south end of the site?

6 A You come in from the north end of the site.

7 Q And this hole you're talking about, would
8 that be more toward the north end or more toward the
9 south end?

10 A I would say more middle-ways of the site.

11 Q Okay. Somewhere around the middle?

12 A Yeah.

13 Q Was there a dock of some kind near that
14 hole?

15 A Well, they used a flatbed trailer for a
16 dock.

17 Q Was that located near that hole?

18 A Yeah.

19 Q What was the purpose of that dock or
20 flatbed trailer?

21 A That was to take the stuff off the trailer
22 that we used, the van -- you know, with the drums on
23 it. We had to take it off.

24 Q Okay. Would the drums be unloaded from the

1 truck and then the waste dumped into the hole?

2 A Yes.

3 Q Was there a tank in that hole, or was it
4 just a hole in the ground?

5 A It's a hole in the ground.

6 Q I know it's hard, but could you give me
7 some approximation of the size of the hole? How
8 deep was it?

9 A I would say when they started, it must have
10 been about -- figure about 40 feet, I'd say.

11 Q And how far across or wide?

12 A That would be -- I'd say about 75 feet
13 wide.

14 Q Did the dimensions or size change during
15 the time you were there?

16 A Yeah. See, the hole wasn't purpose for
17 liquid. There was other garbage in the hole like
18 paper, wood. And that's -- plus, from building,
19 like wrecking buildings, bricks.

20 Q Building debris?

21 A Yeah. All that was in the same hole.

22 Q And then would the liquid be added on to
23 that?

24 A Yeah.

1 Q And then was the hole widened, made bigger?

2 A Yeah. I guess when they got -- I'm not too
3 good at -- I'd say about 100 feet wide. Yeah, about
4 100 feet wide. Because they -- I'd say about 100
5 feet.

6 Q Were there any other buildings on the site?

7 A Yeah. There was a couple of old grain
8 towers there.

9 Q What were those used for?

10 A Well, before we went there, they was for
11 grain. Years ago, they used to ship grain out of
12 there. That's why they call them the old grain
13 elevators. And when they was shipping grain on
14 railroad cars, well, they had those towers for the
15 grain. I guess they'd put it in there and cure it
16 and then ship it out.

17 Q Did you guys at U.S. Scrap use the grain
18 towers for anything while you were there?

19 A No.

20 Q Okay. Was any waste put in those grain
21 towers?

22 A No.

23 Q And were those toward the south end of the
24 site?

1 A They was on the south end of the site.

2 Q Was there also an office trailer of some
3 kind on the site?

4 A Yeah, they had an office trailer on the
5 south end of the site over there by the old tankers.

6 Q And who worked in the office trailer?

7 A Well, let's see. When we first started,
8 when we first moved into there, the guy in the
9 office name was Dave Head, which he died a few years
10 back. And then after Dave Head was Bob Baich.

11 MR. KOWALSKI: That's B-a-i-c-h.

12 BY MR. KOWALSKI:

13 Q Okay. What was Dave Head's job there?

14 A He was like a salesman and a dispatcher.

15 Q And Bob Baich's job?

16 A He was the dispatcher.

17 Q So, he would receive calls from the
18 companies to come and pick up some waste?

19 A Right.

20 Q Okay. And would he then summon a driver?

21 A Yeah.

22 Q Did anyone else work in that office?

23 A Well, after Baich left there, Bobby
24 Thompson, he take it over.

1 Q Bobby Thompson also worked as a truck
2 driver, didn't he?

3 A Yeah.

4 Q And he also worked as a dispatcher for a
5 period of time?

6 A Yeah.

7 Q Do you remember a girl out there or a woman
8 named Lynn?

9 A Yeah.

10 Q Did she work in the office?

11 A Yeah, she worked in the office behind Bobby
12 Thompson.

13 MR. DECKER: Behind?

14 THE WITNESS: Yeah, after Thompson left. See,
15 Thompson went back to driving.

16 BY MR. KOWALSKI:

17 Q And she also worked as a dispatcher?

18 A Yeah.

19 Q Is that pretty much all the people who
20 worked in that office that you can recall?

21 A Yeah, that was all the people that worked
22 there, because that -- she was there until we moved
23 from there and when we went to Riverdale. And we
24 never had another dispatcher.

1 Q Did she go with you to Riverdale?

2 A Yeah.

3 Q Did she go with you to Paxton?

4 A No. She left us in '7- -- after '76.

5 Q When did you go to Riverdale?

6 A I would say between the last of '75 and the
7 first part of '76. It had to be the last part of
8 '75, because she bought a new Olds. She bought a
9 '76 Olds before we moved out there, so that would be
10 the last of '75.

11 Q Were there any storage tanks of any kind on
12 the U.S. Scrap site?

13 A No.

14 Q As far as you know, was waste taken from
15 any of the trucks and put in some kind of holding
16 container and then later taken to 9th Avenue?

17 A Well, not -- we would come in like the --
18 what they call the rover drivers, they would bring
19 in a load and park it; and sometimes at night
20 somebody would take it to 9th Avenue.

21 Q Somebody would take the whole truck over to
22 9th --

23 A Yeah, take the the whole truck over there.

24 Q Other than yourself, how many other drivers

1 worked at U.S. Scrap?

2 A Well, at one time, in '73 up until about
3 '75, I guess all totaled with the night crew, they
4 must have had about 17 drivers.

5 Q What were the hours that the drivers would
6 drive?

7 A From 6:00 o'clock in the morning until you
8 couldn't go no further.

9 Q So, would they drive through the night
10 pretty much?

11 A Sometimes.

12 Q Were there specific shifts you would work?

13 A Yeah. I worked the day shift. See, I was
14 top seniority man, so I sort of picked my own shift.

15 Q And the low men on the totem pole would
16 work the night shift?

17 A The only time I went to night shift was
18 when I got caught at night, you know, like 16 hours,
19 something like that. That's the only time I worked
20 past 5:00 o'clock.

21 Q What were the hours of your shift,
22 generally?

23 A My shift was considered from 7:00 o'clock
24 until 3:30.

1 Q And was there a shift that started at 3:30?

2 A Well, they supposedly got through about
3 11:00 or 12:00 o'clock at night. But the only
4 advantage of driving a truck, you don't have no say
5 now -- or, you know, you might get in at 1:00
6 o'clock. It may be until 5:00 o'clock before you
7 get out of here. It may be 9:00 o'clock before you
8 get back to the yard. Sometimes you stayed out so
9 long they sent another driver out to take over.

10 Q You mentioned Bobby Thompson who was
11 another driver out there. Do you recall the names
12 of any of the other drivers?

13 A Yeah. Well, most of them -- I could tell
14 you their name, part of it. I don't know half of
15 their last names. But Marvin Gentry and --

16 Q How about Ron McFarland?

17 A Ron. And -- names is something that's hard
18 for me to keep up with. Hardy Frazier.

19 Q What was his first name?

20 A Hardy Frazier, they called him.

21 Q Hardy?

22 A Yeah. Let me see. Oh, we had Sylvester
23 Brown. Sylvester Brown had a brother. Now I can't
24 recall his first name. He worked there.

1 Q Do you stay in touch with any of these
2 drivers?

3 A Well, I see Marvin pretty regularly.
4 Sylvester Brown I see pretty regularly. Bobby
5 Thompson I see every now and then. Ron and -- we
6 had another driver named Fred. White guy. I don't
7 remember his last name. Most of them was nicknames
8 anyway. I see quite a few of them, but I would only
9 know their nickname.

10 Q Do any of them still work for Steve?

11 A No. I was the last one.

12 Q Where does Marvin work?

13 A Marvin is working for -- gee, I can't call
14 the name of the company, but he located right there
15 at 59th and the Dan Ryan, working out of there.
16 He's driving a dump truck, excavating. And
17 Sylvester Brown, he's driving for Reverend Jesse
18 Jackson. Not the one that's always on the news.
19 This guy owns a bunch of tankers, and he hauls fuel
20 out of Whiteland, Indiana.

21 Q Do you know the name of the company?

22 A No, I don't remember the name of the
23 company. They located on 43rd and State. And Bobby
24 Thompson, I see him the other day. I forget the

1 name of the company he works for. He's out in
2 Riverdale. He's a dispatcher now for some outfit
3 out there. Ron McFarland, him and Bob Thompson are
4 with the same outfit. That's about it.

5 Q In addition to the truck drivers and the
6 people we talked about in the office, there were
7 also various laborers that worked out at the site,
8 right?

9 A Yeah.

10 Q Do you recall any of their names?

11 A Well, all the laborers but one was Mexican.
12 And they had one called Jesus, Oscar. That's about
13 the only one name I can remember.

14 Q Is Jesus still with Steve?

15 A No. He retired -- well, he got fired last
16 year, I think it was. He got involved in an
17 accident.

18 Q You said all but one were Mexican. Do you
19 recall the one who wasn't?

20 A Hum?

21 Q You said all the laborers but one were
22 Mexicans?

23 A Yeah. Well, his name was Archer Randall.

24 MR. DECKER: Randall?

1 THE WITNESS: Yeah, well, Archer Randall. The
2 nickname was "Water Boy." That's the way anybody
3 would remember him. But his real name was Archer
4 Randall.

5 BY MR. KOWALSKI:

6 Q Do you see him around anymore?

7 A No, I don't never see him anymore. I don't
8 know if he's still alive or not today. And then --
9 that's right. I forgot about him. Two of my
10 brothers worked there for a while, along in '7- -- I
11 would say '73, as laborers.

12 Q What were their names?

13 A Herman Brown.

14 MR. DECKER: Herman?

15 THE WITNESS: Yeah, Herman Brown. He's dead.

16 BY THE WITNESS:

17 A And James Brown. He's up in Milwaukee.

18 BY MR. KOWALSKI:

19 Q How long did James work out there?

20 A About -- I'd say two years.

21 Q Were there any other people out there other
22 than the office people, the truck drivers, and the
23 laborers?

24 A Not that I know of.

1 Q Okay. Steve would be there from time to
2 time, right?

3 A Yeah, he would be there.

4 Q Was he out there on a regular basis?

5 A No.

6 Q Did any of the Churillos work out there?

7 A Who?

8 Q Churillo.

9 A Churillo? No. He never worked there. I
10 know who you're talking about. No, he didn't. He
11 and Steve was some sort of like friends or
12 something. He used to come by there, but he never
13 done any of the work.

14 Q Okay. Were there any employees stationed
15 out at the 9th Avenue site?

16 A Yeah. At -- I guess two or three Mexicans
17 stationed there. That's right. They had a -- they
18 had a guy used to operate the machine there.

19 Q Is that Earl Klepster?

20 A Hum?

21 Q Earl Klepster?

22 A Yeah.

23 Q Did he work at night?

24 A Well, he worked mostly days, but he wasn't

1 at the 9th Avenue site. He was over at the other
2 site. He was the mechanic for the outfit. That was
3 his job. He was listed as the mechanic. He would
4 drive occasionally if a driver didn't show up, but
5 his regular job was a mechanic.

6 Q You mentioned someone operating a machine
7 at the 9th Avenue site.

8 A Yeah. But I can't remember what his name
9 was. I don't even know whether the guy is still
10 alive or not. Because that was a place I never went
11 to much, a few occasional times I would be over in
12 that area I would go in there.

13 Q Why was it you didn't go to 9th Avenue that
14 much?

15 A Well, I pulled a vacuum tank, and we never
16 pulled them into the dump.

17 Q What kind of trucks went into the dump?

18 A Well, the regular truck, like they had an
19 old tanker that they couldn't use on the road, see,
20 and they wasn't very expensive. See, a vacuum tank
21 was very expensive, and they had those pumps on
22 them, and you couldn't go into those soft spots with
23 them. And that was the reason I wanted the vacuum
24 tank.

1 Q So, there was a machinery operator down at
2 9th Avenue and a couple of Mexicans that you recall?

3 A Yeah.

4 Q Was there anyone else who worked there on a
5 pretty much full-time basis?

6 A Not that I know of.

7 Q And the job of the Mexicans, was that to
8 unload drums?

9 A Yeah.

10 Q And the few times you went down to 9th
11 Avenue with a load, do you recall where you were
12 coming from?

13 A Yeah. I would be coming out of Uniroyal in
14 South Bend, Mishawaka, Indiana. Let's see. There's
15 another stop. I can't -- a can company in LaPorte.
16 Those are the three stops that I pulled out there
17 where I would come into there.

18 MR. DECKER: What city was that with the canning
19 company?

20 THE WITNESS: LaPorte.

21 MR. DECKER: LaPorte?

22 THE WITNESS: Um-hum.

23 BY MR. KOWALSKI:

24 Q Was that National Can Company?

1 A Yeah, National Can, LaPorte.

2 Q So, Uniroyal and National Can Company. Was
3 there a third company that you can recall?

4 A Hum?

5 Q Was there another company that you took
6 waste from to 9th Avenue?

7 A No. Because see, I always worked on the
8 other side of the city, up north, out west out
9 there. And when I'd come in, I always dropped my
10 load in the yard, and they would transfer it from my
11 vacuum tank to another, just junk tank like, and
12 they'd take it over there if they had to go over
13 there.

14 Q So, if they were taking a load over that
15 you were picking up in your vacuum tanker, it would
16 be transferred to another truck and another driver
17 would take it over there?

18 A Yeah. What they called night drivers.
19 See, we had -- I would say we had a bunch of drivers
20 on night. All they done was dump load. They didn't
21 have a license. They couldn't run the street. So,
22 they would dump load.

23 Q So, they'd take the loads over to 9th
24 Avenue?

1 A Yeah, some of them did take it over there.

2 Q Do you recall what kind of waste you picked
3 up from Uniroyal?

4 A Uniroyal would be -- I guess you would call
5 it dirty thinner, flammable. So, they call it dirty
6 thinner or something, you know, what they use
7 washing off the paint and all that there.

8 Q How about from National Can Company?

9 A That's the same stuff, just --

10 MR. DECKER: Is that the one in LaPorte?

11 BY MR. KOWALSKI:

12 Q In terms of size of customer, size of loads
13 that would be picked up from these companies, would
14 you describe Uniroyal as a big customer or a small
15 customer?

16 A Uniroyal would be a big customer.

17 Q And how about National Can?

18 A National Can, that's small.

19 Q Do you recall taking waste from any other
20 companies to 9th Avenue?

21 A No.

22 Q Are you aware that other drivers would pick
23 up waste from various companies and take it to 9th
24 Avenue?

1 A Oh, yeah.

2 Q It's just that because of the truck you
3 drove, you didn't take that many loads yourself
4 there?

5 A Yeah. Well, you see, the truck was
6 radioed. You could hear the dispatcher on your
7 radio telling the drivers where to go.

8 Q I see. Was there any kind of -- other than
9 the kind of truck, was there any other distinction
10 made as to which loads would go to U.S. Scrap and
11 which would go to 9th Avenue?

12 A Well, most of the stuff that went to 9th
13 Avenue was the non-flammable stuff, you know, like
14 what they call waste acid, stuff like that.

15 Q Do you know why that was, why they took the
16 non-flammable stuff to 9th Avenue?

17 A Well, not too far from the 9th Avenue site
18 was a couple of homes in there, and, you know, they
19 had to keep the smell and the odor down. That was
20 the general idea, I guess, why they had it set up
21 like that.

22 Q Is it possible that a company's waste might
23 go to U.S. Scrap on one occasion and to 9th Avenue
24 on another occasion?

1 A Oh, yeah, that happened.

2 Q That was common?

3 A Yeah.

4 Q Can you give me the names of any other
5 companies where you would pick up waste and haul it
6 to either U.S. Scrap or 9th Avenue?

7 A Like American Can.

8 Q Do you recall where they were located?

9 A Well, American Can, they had about -- let's
10 see. I pulled out about -- I'd say about four
11 different locations. One on western and -- I would
12 say about 61st and Western. And they had another in
13 Maywood. I think they called that 10th Avenue or
14 something. I don't remember the address. I know it
15 was Maywood. Then we had the one in Hammond we
16 pulled out of. Then we had another. I don't know
17 where they're located at.

18 Q Would that be northwest, in Barrington?

19 A Yeah. And I used to pull a lots out of
20 Rexene out in Joliet.

21 MR. DECKER: That's also American Can?

22 THE WITNESS: Hum?

23 MR. DECKER: Is that American Can you just
24 mentioned?

1 THE WITNESS: In Joliet?

2 BY MR. KOWALSKI:

3 Q Rexene is another company, right?

4 A Yeah. That's in Joliet.

5 Q Let's go to American Can for a moment.

6 What kind of waste did you get from there?

7 A Dirty thinner.

8 Q And what size of customer were they?

9 A Big customer.

10 Q What kind of waste did you get from Rexene?

11 A The amount?

12 Q The kind.

13 A What they call dirty water, water from
14 plastic, where they made plastic.

15 Q And how about the amount?

16 A Well, that was a big stop, too. We could
17 run something like 35, 40 loads a week out of there,
18 at about 5,000 gallons a trip. It was all tankers.

19 Q Which other companies did you pick up from?

20 A Well, there was another company down there
21 called Durkin and Rexene -- I mean below Rexene in
22 Joliet.

23 MR. DECKER: Durkin?

24 THE WITNESS: Yeah. We hauled waste acid out of

1 there.

2 BY THE WITNESS:

3 A Durkin. And then we picked up at Mobil
4 down there, too, right across the street from
5 Rexene. We used to haul what they call waste oil
6 out of there, something like four or five loads a
7 week at 5,000 gallons.

8 BY MR. KOWALSKI:

9 Q So, they were a pretty big customer?

10 A Yeah.

11 Q How about Durkin? Were they a big --

12 A Durkin was a small outfit. They wasn't a
13 very good customer. They was a regular customer,
14 you know, like one load a week.

15 Q Where else did you haul from?

16 A Well, Rex Chain, out of -- where is that?
17 Riverdale?

18 MR. DECKER: One word?

19 BY THE WITNESS:

20 A I think they're located in Riverdale, if I
21 ain't mistaken.

22 BY MR. KOWALSKI:

23 Q Do you recall what you picked up there?

24 A Yeah. Waste -- what they call a cooling

1 oil.

2 Q Were they also called Rexnord, do you
3 recall?

4 A Rex Chain was all I ever knew.

5 Q And could that have been in Dolton?

6 A Yeah, that's right, Dolton.

7 Q Were they a big or a small customer?

8 A Small customer. They were one load a week.

9 Q Which other customers do you recall?

10 A Well, Sun Chemical. There was quite a haul
11 out of there.

12 Q And where were they located?

13 A Sun Chemical, I don't know the location. I
14 don't remember the location. I could go there, but
15 I couldn't tell you the location.

16 Q Was there more than one stop where you went
17 for Sun Chemical?

18 A I don't think so. I don't remember but
19 one. Sun Chemical, I don't remember but one stop.

20 Q Do you recall if it was up north or out
21 west?

22 A I think it was out west.

23 Q Could it have been in Bedford Park or
24 Northlake?

1 A Sun Chemical? More likely would have been
2 in -- not in Bedford. I don't think it was Bedford
3 Park. No, it wasn't Bedford Park. I remember the
4 stop we had in Bedford Park.

5 Q What did you have in Bedford Park?

6 A What did we have in Bedford Park?

7 Q Yeah. What stop?

8 A We had Wrigley Tool. I think it was
9 Wrigley or Royal.

10 Q Oh, Regal Tube?

11 A Yeah.

12 Q Let me go back to Sun Chemical for a
13 minute. What kind of waste did you haul from them?

14 A Dirty thinner. They call it dirty solvents
15 and all that.

16 Q Dirty thinner or dirty solvents they also
17 called it?

18 A Yeah, all the same.

19 Q And what size of customer were they?

20 A Pretty good size.

21 Q Do you recall how much you would haul for
22 them?

23 A I would say we was running something like
24 three loads a week out of there and about 80 drums a

1 trip.

2 Q Do you recall what you hauled out of Regal
3 Tube?

4 A Yeah. It was acid. That was a big stop,
5 too.

6 Q Do you recall how many loads you'd take out
7 of there?

8 A Well, we'd run something like -- I'd say 20
9 loads a week out of there.

10 Q Would that be a tanker?

11 A Yeah.

12 Q 5,000 gallons?

13 A Yeah.

14 Q Which other companies do you recall?

15 A Let me see. Abbott Laboratories up in
16 North Chicago.

17 Q Do you recall what you hauled from them?

18 A That was a -- some sort of waste from
19 medicine they made. They made penicillin and baby
20 food. And they came with the waste from that. I
21 don't remember what they list this as. It wasn't
22 solvents. What did they call that thing? I just
23 don't remember what they really called it.

24 Q Do you recall what size of customer they

1 were?

2 A They was a pretty good size customer. We
3 were running three or four loads a week out of
4 there, and they was 80 drums a load.

5 Q Did you sometimes drive a tanker truck and
6 sometimes a flatbed for drums?

7 A Where? To Abbott?

8 Q No. You.

9 A Yeah. I -- the first -- I'd say '73 and
10 '74, I -- well, I'll say it started about '62 up to
11 '73, I was a trailer man. I pulled a van. There
12 wasn't no flatbed vans with a drum.

13 And in '73, he bought the vacuum tank, and
14 I went to the vacuum tank. From '73 on, all I did
15 was vacuum tank work, no drums, just vacuum tanks.
16 But all this here was before them drums stuff and
17 stuff where I was pulling from -- that was from '62
18 up until '73.

19 Q Okay. So, that was before you got the
20 vacuum truck?

21 A Yeah, that was before we went into the
22 vacuum tank.

23 Q Okay. You mentioned Abbott Labs. Which
24 other companies do you recall?

1 A Up there would be U.S. Envelope.

2 Q That was also up north?

3 A Yeah. That was in Waukegan. That was a
4 small stop.

5 Q What else do you recall?

6 A I made another -- one stop up in there with
7 Johnson Motors, a one-shot deal. That was a load of
8 drums.

9 Q Do you recall what was in the drums?

10 A Yeah. Dirty gas.

11 MR. DECKER: What kind of gas?

12 THE WITNESS: Dirty gas. You know, the gas they
13 use to check the main engine with; and then when
14 they're going to ship it, they take it out. They
15 call it dirty gas.

16 BY MR. KOWALSKI:

17 Q Was that also in Waukegan?

18 A Yep.

19 Q And that was a one-time load?

20 A Yeah.

21 Q Do you recall the size of the load?

22 A Yeah. It was 60 drums.

23 Q What did you haul out of U.S. Envelope?

24 A Old varnish and ink.

1 Q And what?

2 A Ink, waste ink, you know, where they use --
3 you know, they run the print machine and the waste
4 ink. I guess where they'd clean them up, the
5 machine.

6 Q What other companies do you recall hauling
7 from?

8 A Let's see. A big company I used to haul
9 for out of Milwaukee, a big paint company. Now I
10 forget the name of them. They moved from Milwaukee
11 to Eau Claire, Wisconsin. It was a big outfit, but
12 I can't remember the name of it.

13 Q If I told you the name, do you think you
14 could remember?

15 A Oh, yeah.

16 Q Would that be P.P.G. Industries?

17 A That's it. They located now in Eau Claire,
18 Wisconsin, ain't they?

19 Q Oak Creek.

20 A Oak Creek. Why I keep calling it Eau
21 Claire? Oak Creek, Wisconsin. Why I keep calling
22 it Eau Claire, I don't know.

23 Q And what did you pick up from them?

24 A Dirty thinner.

1 Q And in terms of size, how would you
2 describe them?

3 A Well, I would say we were running something
4 like 160 drums a week, and about 10,000 gallons in
5 tankers.

6 Q Would the 10,000 gallons in tankers also be
7 per week?

8 A Yeah. That's two trips.

9 Q Okay. Which other companies do you recall?

10 A Let's see. Well, Val Spar up in Rockford,
11 we did a lot of business with them up there.

12 MR. DECKER: What was the name?

13 MR. KOWALSKI: Val Spar, V-a-l-s-p-a-r.

14 BY MR. KOWALSKI:

15 Q And what did you pick up from Val Spar?

16 A A thinner, dirty thinner.

17 Q And in terms of size, how would you
18 describe them?

19 A I would say they was a pretty heavy stop.

20 Q Do you recall what size loads you took out
21 of there?

22 A Yeah. We'd take 80 drums, and we'd pull
23 roughly two loads a week out of there.

24 Q So, it would be 80 drums two times a week?

1 A Yeah.

2 Q The drums that you're describing, are those
3 55-gallon drums?

4 A 55-gallon drums.

5 Q Okay. Which other companies do you recall?

6 A Well, let's see. Continental Can had a
7 stop in Milwaukee. The exact address, I don't know.
8 Then they had one right off of North Avenue, and
9 they also had one in Bedford Park.

10 Q So, they had three separate stops you would
11 make?

12 A Yeah.

13 Q And what did you pick up there?

14 A Can -- drums. Well, in Milwaukee, I picked
15 up -- I hauled acid out of there in a tanker, 5,000
16 gallons about twice a week. But the Chicago
17 locations, them was drums.

18 Q Was that also acid you picked up out of
19 Bedford Park in Chicago?

20 A No. That would be thinner in drums.

21 Q And what was the size of the loads you
22 picked up?

23 A Well, we was running -- we was running 60
24 drums a load, because them would drop trailer. We'd

1 spot them. We'd load them. We'd switch them. So,
2 they'd load 60 drums to a load.

3 Q And how often would you pick up 60-drum
4 loads?

5 A I'd say somewhere around two or three times
6 a week.

7 Q Which other stops do you recall?

8 A We run Muscatine, Iowa, Monsanto Chemical.

9 Q What did you pick up there?

10 A Ammonia.

11 Q And in terms of size of customer, where
12 would they fit?

13 A Well, I would say in '73, every 12 days I'd
14 pick up 5,000 gallons. That lasted up until
15 about -- the last was '74.

16 Q And what happened in '74?

17 A They lost the stop to some other outfit, I
18 guess.

19 Q So, they were a customer only up through
20 '74?

21 A Yeah, for lack of -- yeah, '74. Because we
22 lost them before we moved to Riverdale, so it had to
23 be '74.

24 Oh, I know why they lost the stop. They

1 lost the stop because one of the drivers went in
2 there and smoked. They caught him smoking in the
3 plant. That's what happened. It was a fairly
4 dangerous place to smoke. And one of our drivers
5 got caught smoking in the plant. That's how they
6 lost the stop.

7 Q So, Monsanto was a customer up until the
8 time you moved to Riverdale?

9 A Yeah.

10 Q Did you have any other customers in Iowa?

11 A Yeah. We had one in Clinton, Iowa, but I
12 don't recall the name of it. All I know is it was
13 there, and we was hauling acid out of there. I
14 think they made some like shopping cart.

15 What was the name of it? I forget what
16 they call that place.

17 Q Would that be Collis?

18 A Collis Company, yeah. Because we only had
19 the two in Iowa that I know.

20 Q What did you pick up from Collis?

21 A Acid.

22 Q And do you recall the size or frequency of
23 the loads?

24 A Well, I would say we were running about two

1 loads a week out of there. Every one of them would
2 be where I would go on Sunday, sometimes, and
3 nights. And I'd say two loads a week.

4 Q Would that be two 5,000-gallon tankers?

5 A No, half a tank. We'd run 2,000 most of
6 the times. Because acid's pretty heavy. Coming
7 down there, we had to cross the scales.

8 Q So, that would be two loads of 2,000
9 gallons each?

10 A Yeah, something like that.

11 Q Other than Monsanto, which U.S. Scrap lost
12 as a customer, as you just said, were the rest of
13 these customers pretty much the entire time you were
14 out there driving?

15 A Say that again.

16 Q Other than the one company, Monsanto, in
17 Muscatine Iowa, were the rest of these companies
18 you've mentioned customers throughout the time you
19 were a driver?

20 A Yeah.

21 Q Okay. You will tell me if any of these
22 customers were lost as customers during the time you
23 drove. Okay?

24 A Well, let me see. During the time I was

1 driving, we lost Mobil Oil.

2 Q When did you lose Mobil Oil?

3 A Oh, it had to be about the last -- I'd say
4 around '74, somewhere between the last of '74 and
5 the early part of '75.

6 Q Did you also haul for Mobil Chemical?

7 A I don't remember them.

8 Q What other companies do you recall?

9 A Well, we hauled quite a bit out of Clark
10 Oil there in Blue Island. We must have lost them
11 about -- in '74, somewhere around '74.

12 Q Do you recall why you lost them as a
13 customer?

14 A I don't remember how -- why they lost them,
15 but they -- I know they lost them. See, that's the
16 part they never tell the drivers, why they lost
17 them. Maybe somebody underbid them or something.

18 Q What did you haul out of Clark Oil?

19 A Waste oil they called it.

20 Q And were they a --

21 A Big stop? Yeah. Three or four loads a
22 day.

23 Q What were the sizes of the load?

24 A 5,000 gallons, a whole tanker.

1 Q Which other customers or companies do you
2 recall?

3 A International Harvester.

4 Q And where were they located?

5 A Let me see. Around -- about 122nd, right
6 off of Halsted. And exactly -- that's the closest I
7 can come to it. But 122nd, right off of Harlem.

8 Q Do you recall what you hauled out of there?

9 A Acid.

10 Q And where did they rank in terms of size of
11 customer?

12 A Well, we run three loads a week out of
13 there, 5,000 gallons. Very easy to remember,
14 because we had the same time to be in there, and we
15 had to get all three loads at the same time. Now,
16 we had another big acid stop on 103rd and Torrence.
17 It's a wire outfit. I'll never recall the name of
18 it, but I know the location. 103rd and Torrence, a
19 big wire company in there.

20 Q Is that Chicago Steel & Wire?

21 A Chicago Steel & Wire.

22 Q Do you recall if you took the acid from
23 Chicago Steel & Wire to 9th Avenue or U.S. Scrap?

24 A That went to U.S. Scrap.

1 Q And in terms of size, where would you place
2 Chicago Steel & Wire?

3 A Chicago Steel & Wire, I think that we had
4 to take four loads out of there at a time, and that
5 was once the week.

6 Q And were those also 5,000-gallon tankers?

7 A Yeah. And we had another wire outfit over
8 there in Blue Island, same type of stuff, same -- I
9 can't recall the name of it. I think that was a --

10 Q Is that Enterprise Wire?

11 A Yeah, in Blue Island. That was acid.

12 Q Do you recall the size or frequency of
13 those loads?

14 A Well, that was -- I would say six loads of
15 5,000 gallons. See, the reason I can recall them
16 so -- when we'd pull in there, we'd clean out a vat.
17 They'd have like a pit; and every time we'd go in,
18 we'd have to clean it out so they could put freight
19 in there.

20 MR. DECKER: Excuse me. Can I make a call.

21 (Short interruption.)

22 BY THE WITNESS:

23 A We had another big chemical company in
24 Bedford Park. I don't remember the name of them.

1 Would it be right off of 65th somewhere, between
2 Cicero and Central -- no, between Central and Harlem
3 Avenue right in there, a big chemical company. We
4 pulled a lot of tanks out of there. Often boxes out
5 that way, too.

6 Q It was in Bedford Park, this chemical
7 company you're thinking of?

8 A Yeah. Big chemical -- I can't recall the
9 name of it. A few years back.

10 Q Do you recall what street it was on?

11 A Hum?

12 Q Which street was it on?

13 A On 65th, between Central and Harlem Avenue,
14 so, let me see. Central is 56 -- it should be about
15 60-some-hundred West 65th Street.

16 Q Is that Nalco Chemical?

17 A Yeah. Ain't they about -- what are they
18 address? It's about 60- -- what?

19 Q Would that be 621 West 66th Street?

20 A That's it.

21 Q Okay. And what did you haul out of there?

22 A Acid.

23 Q And the size of the --

24 A That was a big stop.

1 Q Do you recall how much or --

2 A We was running about five loads a week out
3 of there, 5,000-gallon trip. It was a nice stop.

4 Q You mentioned at Enterprise Wire you ran
5 about six loads consisting of 5,000 gallons. Would
6 that be per week?

7 A Yeah, all be for the same time. And we had
8 another small stop there, Brightly Galvanized, on
9 Cicero.

10 MR. DECKER: What was that?

11 MR. THOMAS: Brightly Galvanized.

12 MR. DECKER: Bradley?

13 MR. THOMAS: Brightly.

14 BY MR. KOWALSKI:

15 Q Do you recall how much you hauled out of
16 there?

17 A That was a small stop, about one load a
18 week at 5,000 gallons.

19 Q Which other companies can you recall?

20 A Well, right down the street from them was
21 Western Electric, a big drum stop.

22 Q What did you haul out of there?

23 A Thinner, about -- I think I'd run about
24 three loads a week out of there. They must have

1 lost them about '73, I believe. I think it would be
2 about '73 when we lost that stop. It should be 22nd
3 and Cicero.

4 Q When you say three loads a week, would that
5 be --

6 A Drums, 80 drums to a crack.

7 Q Which other companies can you remember?

8 A DeSoto Chemical.

9 Q Where were they located?

10 A Well, they've got one in Chicago Heights,
11 and they had one on the West Side over there around
12 5th avenue and Roosevelt Road. That one, I think
13 they moved, tore down or something. But the one in
14 Chicago Heights is still out there. See, maybe they
15 had three plants, but I remember them two.

16 Standard T Paint be out there in Chicago
17 Heights.

18 Q Anyone else in Chicago Heights you recall?
19 Any other stops in Chicago Heights?

20 A We had another, but I can't call the name
21 of it. It was a small stop. They refined like oh,
22 paints and stuff. They refined it or recleaned it
23 or something. I can't recall the name of that
24 company.

1 Q Do you recall hauling for Stauffer Chemical
2 in Chicago Heights?

3 A Stauffer Chemical. That would have to be
4 it, then, because I only remember three companies
5 out there. Standard T, DeSoto, and Stauffer
6 Chemical. That would have to be it.

7 Q Do you recall which street the other
8 company was on?

9 A No. But I can't -- I couldn't tell you
10 what street that was on. I believe -- it seems like
11 to me that DeSoto Chemical is on State Street. I
12 believe DeSoto Chemical is on State Street.

13 But Standard T, I don't remember what
14 street they was on. I can go there, but I couldn't
15 tell you what street they're on.

16 MR. DECKER: Can we go off the record for a
17 moment.

18 (Discussion held off the record.)

19 MR. KOWALSKI: Okay. Back on the record.

20 BY THE WITNESS:

21 A When he'd leave home, his wife say, "Bring
22 something home." If he thought he'd forget, you'd
23 tie a string around his finger.

24 And actually me, I'd remember. And I had a

1 poor dispatcher. And when I first started driving,
2 Steve was the dispatcher. And he'd give you a list
3 of things in the morning, and you wouldn't see him
4 any more in the morning.

5 Half the time, he'd tell you a certain
6 place to go and that was it. And sometimes he'd
7 stick a ticket up under the telephone, and you
8 wouldn't see him no more for a couple of days.

9 BY MR. KOWALSKI:

10 Q Do you recall what you hauled out of DeSoto
11 Chemical?

12 A Oh, yeah. Dirty thinner.

13 Q And how -- do you recall how much?

14 A Yeah, DeSoto Chemical was a great big stop
15 for quite a while. We was running like -- I'd say
16 out of the two plants, we was running something like
17 five loads a week at 80 drums a crack.

18 Q Do you recall what you picked up from
19 Standard T Chemical?

20 A Thinner.

21 Q And how about amounts?

22 A Well, I was running something like one load
23 a week out there, 80 drums a load. That's about it
24 it. But, no, they had two plants. They had one

1 here around -- what was it? 20-something and
2 Federal.

3 Q 26th and federal?

4 A Yeah. Well, that was like a load a week.
5 One of them was a -- this is down here. I did pump
6 some tanks down there once or twice for them.

7 Q That's the one in Chicago?

8 A Yeah.

9 Q So, when you say a load a week, that would
10 be from each facility?

11 A Yeah, one load a week from each one of
12 them.

13 Q Okay. And the third company that you
14 believe is Stauffer Chemical, what did you haul out
15 of there?

16 A We -- I think we was hauling dirty thinner
17 out of there. And that was all tankers.

18 Q How much?

19 A 5,000 gallons, something like that a week.

20 Q Which other companies do you recall?

21 A Let me see. Now we're getting down to the
22 small companies, and the names of them I ain't gonna
23 never call. Like we had -- I had about three stops
24 in Franklin Park. Now, I would never call the name

1 of a damn one of them. And all of them was small
2 acid stops.

3 Q If you heard the names, do you think you
4 might recall?

5 A Oh, I probably could.

6 Q Do you recall a company called Boltmaster?

7 A Yeah.

8 Q And were they in Franklin Park?

9 A Yeah. Small stop. And my favorite stop
10 would be --

11 Q Do you recall a stop in Franklin Park for
12 National Precision Circuits?

13 A Yeah. That's where we always got the
14 candy.

15 Q What do you mean when you say you'd get
16 some candy?

17 A Well, the guy who owned it, I guess he was
18 the owner, he had a little jar of candy sitting on
19 the desk. He'd always give me some candy.

20 Q Do you recall a company called American
21 Rivet?

22 A Yeah.

23 Q And were they also in Franklin Park?

24 A Yeah.

1 Q How about a company called National Bronze?

2 A That's in Franklin Park, ain't it?

3 Q Yeah. Was that a stop, too?

4 A Yeah. That should be all in Franklin Park.

5 Q Do you recall what you picked up at

6 Boltmaster, what kind of waste?

7 A Acid.

8 Q Were these all acid stops?

9 A Yeah, all of them was acid stops.

10 Q Just so we're clear on the record here,

11 Boltmaster, National Precision, American Rivet and

12 National Bronze were all acid stops?

13 A Yeah. The reason I remember so good is
14 because some of them, sometime they would run light.
15 Maybe they'd have 2,000 gallons, and I'd mix it up.
16 And we had to be sure it was the same thing, because
17 chemicals you have to be careful about mixing them.
18 You couldn't mix nothing with acid but acid, unless
19 you wanted to start a fire.

20 Q Okay. Do you recall the size of those
21 loads?

22 A Well, neither one of those stops would have
23 over 3,000 gallons a week, not a one of them. They
24 was all small. I guess -- I call it a one-owner

1 place. It looked like the guy that runned it owned
2 it, small place, two or three guys working there.

3 Q Which other companies can you recall?

4 A Let's see. We had a -- Huber Ink out there
5 on 40-something, Huber Ink. And where the heck were
6 they located at? Around 42nd, right off of --
7 between Cicero and Pulaski. That was an ink
8 company.

9 Q And what kind of waste did you pick up
10 there?

11 A Waste varnish. It was old varnish. They
12 made varnish, and they would -- I guess they would
13 wash the machines out, and I got that. A lot of
14 bags. You know, the bag would come in -- the --
15 what they call black stuff would come in bags, and I
16 would get the bags and a few drums. That was a
17 mixed load with -- I guess more you would call it
18 rubbers.

19 Because I would get 100-pound paper bags.
20 They call that stuff lam-black or something that
21 come in the 100-pound bags. And I would get all the
22 bags and a few drums. It wasn't with -- just
23 rubbish, garbage bags -- I mean bags.

24 Q The stuff in the bags wasn't liquid?

1 A It wouldn't be nothing in the bags. The
2 bags would be bundled up. They'd be like, say, a
3 bundle of bags like that, and they'd tie them right
4 up and throw them right in the trailer.

5 Q In terms of the drummed waste you picked up
6 there, would that be a small stop?

7 A Yeah.

8 Q Do you recall how many drums?

9 A 60 drums. But they loaded the trailer.
10 See, most of the places where we dropped the trailer
11 and they loaded and we switched. We never would put
12 over a 60-drum trailer in there. The big trailers,
13 like 80 drums, we pulled them all the time.

14 Q Would that be 60 drums per week?

15 A Yeah.

16 Q Which other companies can you recall?

17 A Let me see. Clark Equipment. They -- was
18 that Aurora or Rockford? No, not Rockford. Aurora
19 or Elgin. Clark Equipment. They out west there.

20 Q Okay. Do you recall what you picked up
21 there?

22 A We had a tanker. We'd pull a tanker out of
23 there, and about two loads a week, 5,000 gallons.
24 And it was waste, dirty thinner.

1 Out in that neighborhood, we had another
2 big stop out there. Green something. What is it?

3 MR. DECKER: Barber-Green?

4 THE WITNESS: Yeah, Barber-Green. He's out that
5 way, too. That was a big stop.

6 BY MR. KOWALSKI:

7 Q What did you pick up there?

8 A Thinner, dirty thinner.

9 Q You say they were a big stop?

10 A Yeah. They brought a load every day, 80
11 drums a load.

12 Q 80 drums per day?

13 A Yeah.

14 Q Which other stops can you recall?

15 A There was a stop named Stressan-Reuter or
16 something like that.

17 Q Stressan-Reuter?

18 A Yeah. And what was the name of the town
19 they were located in?

20 Q Would that be Bensenville?

21 A Yeah. We had some more stops in
22 Bensenville. I don't know -- I don't recall the
23 name of them. We had a couple of acid stops in
24 Bensenville. What was it?

1 Q What did you pick up from Stressan-Reuter?

2 A Acid.

3 Q And what size a stop were they?

4 A That was about one load a week. I'd say
5 4,000 gallons a week.

6 Q You said you had some other acid stops out
7 in that general area?

8 A Yeah.

9 Q Would that still be Bensenville, or would
10 that be another town, perhaps?

11 A That would be the next town, Elk Grove
12 Village. We should have -- you should run across
13 three or four stops up there. I can remember those
14 stops well, but I can't remember the name of them.
15 I do know the location of them. I don't remember
16 the name of them.

17 Q If you heard the name, would it refresh
18 your recollection, perhaps?

19 A Yeah. I could go there.

20 Q Morton Chemicals, was that one?

21 A Yeah. Where are they? On some sort of
22 drive? Have you got the address there?

23 Q I don't have the address for them. How
24 about Prefinished Metals?

1 A Yeah.

2 Q Do you recall --

3 A That was acid. There should be another.

4 Q How about Premier Paints?

5 A Yep.

6 Q Do you recall a company called Size
7 Control?

8 A Yeah.

9 Q Were they a customer there, too?

10 A Yeah.

11 MR. DECKER: We're talking Elk Grove here still?

12 MR. KOWALSKI: Yes.

13 BY MR. KOWALSKI:

14 Q These are all in Elk Grove Village, right?

15 A Yeah. They all neighbors.

16 Q Was there also a customer called Specialty
17 Coatings out there?

18 A Yeah.

19 Q Let's go through these one by one,
20 Mr. Brown. Do you recall what you picked up from
21 Morton Chemicals?

22 A Thinner.

23 Q And how about Prefinished Metals?

24 A That was acid.

1 Q Premier Paints?

2 A That was thinner.

3 Q Size Control?

4 A That's acid.

5 Q And Specialty Coatings?

6 A I think that was acid, too. I wouldn't
7 swear to you, but I think that's acid. I think that
8 was acid, too. I know a lot of them was, but that
9 one --

10 Q And how about the size of those loads?

11 A Well, all of those stops run something like
12 a load a week. Each one of them was on a load a
13 week.

14 Q And when you say a load, are you talking in
15 terms of a tanker or drums?

16 A Well, drums. I'd say each one of them --
17 all of them was loaded. I would say 80 drums a
18 week. Because we didn't never drop no trailers out
19 there. And we had a -- another good big stop.
20 Where is Sara Lee Bakery located? Do you know Sara
21 Lee Bakery? We used to run a lot of stuff out of
22 there. Waukegan Road, and what little town it's
23 supposed to be in, I don't remember. But I remember
24 it.

1 Q Do you recall what you picked up from
2 Sara Lee?

3 A They called it slop.

4 Q Was it food waste?

5 A Food waste.

6 MR. DECKER: Is that Wheeling?

7 THE WITNESS: No. It's up around Deerfield up
8 in there. Right off of -- it's on Waukegan Road and
9 what? I don't know what they call that. It's in
10 there between Deerfield and Half Day, somewhere back
11 in there.

12 BY MR. KOWALSKI:

13 Q It's on Waukegan Road in Deerfield?

14 A Yeah, that's it.

15 Q Do you recall picking anything up there
16 other than food waste?

17 A No. The stuff we'd pick up in the bakery,
18 they boxed up cheap in the bakery there, like cakes
19 and pies.

20 Q What other customers can you recall?

21 A Well, let's see. We've got another big
22 drop out in -- I don't recall the name of the little
23 old town now. I don't remember. Rhinelander,
24 Wisconsin. But that was some small stuff. Then we

1 got one load a week out of that. And it didn't last
2 too long, about -- I don't think that lasted six
3 months.

4 Q Do you recall which company that was?

5 A No, I don't remember what company that was.
6 I only went there one time, but -- because every
7 driver went up there. He didn't go back the second
8 time, to get out of the cold. It was in the
9 wintertime. I think Steve was the first one went up
10 there.

11 Yeah, we got some sort of fine or something
12 we were getting out of there.

13 Q Could that have been Triumph Twist Drill?

14 A That's it.

15 Q And what did you pick up there?

16 A I think they called it cianide or something
17 like that, some sort of chemical like that. Cianide
18 or -- what did they call that?

19 Q And what was the size of the load?

20 A The size of the load would have been 4,000
21 gallons.

22 Q And how often would that be picked up?

23 A That was picked up once a week. But that
24 only lasted about three months. I don't know what

1 happened. I don't know was it they got tired of
2 wounding the drivers to go get it or they lost it to
3 somebody else. It wasn't one of those stops nobody
4 wanted to go. I remember that.

5 Q Do you recall any other stops up there in
6 Wisconsin?

7 A In Wisconsin?

8 Q Yes.

9 A Yeah, American Motors in Kenosha.

10 Q What did you pick up there?

11 A That was a tanker that we hauled thinner
12 out of there, dirty thinner.

13 Q Is that a 5,000-gallon tanker?

14 A Yeah.

15 Q How often would you pick that up?

16 A Once a week. I think that lasted about two
17 years. That was American Motors, you know, where
18 they make them little cars. That's where that was.

19 Q Which other companies can you recall?

20 A I think that's about it. Let's see -- I
21 might recall some if you name some more, but what I
22 can, you know, remember, that's about -- I remember
23 a couple of more companies. I can't recall the name
24 of it and the location of the town, what town they

1 was in.

2 Q Okay. So, if I named a couple of
3 companies, it might refresh --

4 A Well, we had -- do you got Rust-Oleum there
5 in Evanston?

6 Q No. Were they a customer?

7 A Yeah. They run -- I run double out there,
8 tanks and drums.

9 Q What did you pick up there?

10 A Dirty thinner.

11 Q How many times would you --

12 A About -- well, I'd say two drum loads and a
13 tanker a week.

14 Q Would those be the 80-drum loads or 60?

15 A 80-drum loads.

16 Q And the tanker would be a 5,000-gallon?

17 A Yeah. They used to have to pump once a
18 week. They had another stop up in Skokie. What the
19 heck was that?

20 Q Felt Products?

21 A Yeah.

22 Q What did you pick up there?

23 A Thinner. That was about a load a week, an
24 80-drum.

1 Q Do you recall any other stops up there?

2 A No. We had another stop in Evanston, but
3 it was a small stop, some sort of furnace place
4 where they made furnaces. But I don't remember the
5 name of it. But I remember it was a small stop, and
6 I only remember going there once or twice. It was
7 right in there around that other outfit. It was a
8 small stop. I remember I was there twice. Each
9 time I went there, I got about 45 drums.

10 Q Do you recall any other stops?

11 A Yeah. We had another big stop in Rockford,
12 where they made nuts and bolts. I can't call the
13 name of the company. Rockford, right in that little
14 town on 88. What was the name of that? Some place
15 that made nuts and bolts. Was it E.W.W. and
16 something? It was a big -- I mean a big acid stop.
17 Oh, I forgot the name of that. Because that was one
18 of the Sunday stops, cash deals you got to go out on
19 Sunday.

20 Q Would that be called Boyar Schultz, Boyar
21 Schultz?

22 A In Rockford?

23 Q Yes.

24 A That could be the name of it. That's -- we

1 only had one stop that I know of in Rockford. That
2 don't sound right, the name, though.

3 Q Okay. Do you recall any other companies
4 other than the nut and bolt place in Rockford?

5 A No.

6 Q Okay. The nut and bolt company in
7 Rockford, you think it was off Highway 88?

8 A Right on Highway 88, just before you go
9 over the -- what was that little road? It was W.
10 E. --

11 Q You picked up acid there?

12 A Yeah.

13 Q W. C. Richards?

14 A W.-something they called it. We used to go
15 there on a Sunday, because -- well, at that time, we
16 belonged to a union, and they'd have to pay us
17 trippie time to work on Sunday. And they would
18 always send two drivers down -- Sunday was the best
19 time to get in the plant was on a Sunday. And two
20 drivers always go on Sunday, and they paid you cash.
21 So, you know, to keep from paying us triple time,
22 they'd just pay us cash.

23 MR. DECKER: Let's not get into that.

24 THE WITNESS: And we'd stay out all night

1 Saturday night, and we'd go down there.

2 BY MR. KOWALSKI:

3 Q Do you recall any other big stops?

4 A I think that's about the -- that should be
5 the -- all of the big stops.

6 Q Okay.

7 A They had some little ones where maybe I
8 never went. I maybe went one time. I wouldn't
9 remember.

10 Q Did you pick up at any railroads, railroad
11 yards?

12 A Yeah -- oh, that's right. Chicago
13 Northwestern. Yeah, that was a -- boy, that's the
14 one we got four loads a week out of there.

15 Q What size of loads were those?

16 A 5,000-gallon. Boy, I should never have
17 forgotten them.

18 Q Where were they located?

19 A In Northlake.

20 Q And what was the nature of their waste?

21 A Waste diesel fuel. That's right. We had
22 another stop in Northlake. It was a paint company.
23 What the heck was that? On Lake Street and -- right
24 there in Northlake.

1 Q On Lake Street in Northlake?

2 A Yeah. It's --

3 Q Do you remember a company called Scholle or
4 Scholle Chemical?

5 A Yeah.

6 Q Was that Northlake?

7 A I don't think -- was they -- they might
8 have been in Northlake. But I remember the company.

9 Q Okay. Going back to the company you recall
10 on Lake Street in Northlake, would that have been
11 one of the Sun Chemical facilities?

12 A It could have been. I know it was a paint
13 company. Yeah, maybe it was Sun Chemical.

14 Q And what did you pick up there?

15 A I think they bought them out -- bought the
16 other company out. That's right. There was some
17 other company, but Sun Chemical bought them out. It
18 was drums and waste thinner.

19 Q Of thinner?

20 A Yeah. And then we had another stop what
21 I'm thinking about, right down there. It was
22 Zenith.

23 Q Zenith?

24 A Yeah.

1 Q Would that be Rauland Tube?

2 A That's right. Yeah, that's the name of it.
3 What is that -- that's Northlake, too, ain't it?

4 Q Do you know where the Zenith stop was?

5 A Yeah. Right off the toll road in
6 Northlake, just -- just across North Avenue, right
7 alongside of the toll road. Frontage Road they
8 called it.

9 Q Are you thinking of Xerox, perhaps?

10 A No.

11 Q No? You're thinking of Zenith?

12 A I know it's Zenith.

13 Q Do they go by any other name?

14 A I don't know. That's where they made all
15 the TV tubes.

16 Q Was that 25th Avenue and North Avenue?

17 A It could be.

18 Q In Melrose Park? Is that it?

19 A Yeah. It's in Melrose Park, because we had
20 another stop down there. It was on the other side
21 of the road. That's where they make all this mess
22 for women, hair oil and lipstick and fingernail
23 polish, lady's something.

24 Q Would that be Alberto Culver?

1 A Yeah. We used to haul them. And then
2 you've got, up there in Melrose Park, would be
3 called Multi-Foods. They was up there, stinky
4 mothers, coconut oil.

5 Q The only thing you hauled out of
6 Multi-Foods was the coconut oil?

7 A Yeah. That was real stinky.

8 Q Let's backtrack here just a little bit.
9 The Zenith plant, what did you pick up there?

10 A Drums of dirty thinner. Two loads -- two
11 to three loads a week, 80 drums a crack. So, that's
12 right. There was another company right across the
13 street from them. Two companies, and the one it was
14 a paint company. Benjamin Moles or Molson? There's
15 a paint company in there. Benjamin --

16 Q Benjamin Moore, on North and 25th?

17 A Yeah. Now, there's two companies in there
18 together. What was that one? Both of them was in
19 the same yard, but it was two different companies.

20 Q Two paint companies?

21 A One was like a paint company, and one was
22 like a furnace. They were both in the same yard.
23 It could have been the same company and they just
24 used two different names. Because I know when I go

1 with the vacuum tank, I'd have to go to one place to
2 get the tickets on, and I'd have to go to another
3 place all in the same yard.

4 Q Do you recall a company called Reflector
5 Hardware?

6 A Yeah.

7 Q Is that also there in Melrose Park?

8 A Yeah.

9 Q Was that also on 25th Avenue?

10 A Yep. They're all in there pretty close
11 together.

12 Q Is that the other company you were thinking
13 of, or is there another one?

14 A It's a paint company. It could have been
15 Sun Chemical. I remember when I first started
16 hauling out of there, and I was hauling drums out of
17 there, and they changed the name of it. So somebody
18 bought them out.

19 Q Would that be Technical Coating?

20 A That could -- that's it.

21 Q Okay.

22 A They changed the name. That's right.

23 Q And that was there on North Avenue and
24 25th, right?

1 A Yeah.

2 Q Okay. What did you pick up from Technical
3 Coating or Benjamin Moore?

4 A Drums.

5 Q Do you know what was in the drums?

6 A Thinner.

7 Q And how many drums did you pick up there?

8 A 80 drums a load, and I was running about a
9 load a week out of each one of them.

10 Q So, that would be 160 drums per week total
11 out of those two facilities that were adjoined?

12 A Yeah.

13 Q And you mentioned earlier Alberto Culver,
14 the company in that area that made the women's
15 products?

16 A Yeah. We picked up a tank load of stuff a
17 week out of there. It was water and soap. It
18 looked like soap. But you could smell it five miles
19 away. It smells good. All that good-smelling stuff
20 they was making for them girls, the waste off of it.

21 Q And when you say one tanker load a week,
22 would that be a 5,000-gallon tanker?

23 A Yeah.

24 Q How about Reflector Hardware? Do you

1 recall what you pulled out of there?

2 A Yeah. That was thinner. And I think we
3 was running about -- something like five loads a
4 month out of there.

5 Q Would that be drums or tanks?

6 A Drums, 80 drums a crack.

7 Q Okay. Do you recall any other companies?

8 A No. I'd have to sleep a while before I
9 think of nothing.

10 Q Do you recall any steel companies you
11 hauled for?

12 A Steel companies? Other than I was in U.S.
13 Steel once, I think, to pick up a load of acid.

14 Q Where was that?

15 A That was one on -- what is it? 89th Street
16 or something like that over there? I only picked
17 that one load of acid out of there, what they call
18 raw acid. So, yeah. Republic Steel. You got that?

19 Q Republic Steel?

20 A Yeah. That was a big stop.

21 Q And where was that located?

22 A That's on 116th and Avenue O. It's L.T.D.
23 now.

24 Q And what did you haul out of there?

1 A Acid.

2 Q And do you recall how much?

3 A I would say five loads a week.

4 Q And what size load are we talking about?

5 A A 5,000-gallon. And all those was one day.

6 We'd clean out a tank there, every week we had to.

7 We'd come every week, or we'd come on a different

8 day like -- I guess it was so many hours they --

9 then we'd have to give them. Sometimes we'd go on

10 Saturday night. Sometimes we'd go on Sunday night.

11 But once a week, we'd have to clean that tank for

12 them.

13 Q Backtracking just a moment, the one load of

14 acid you took out of U.S. Steel, what was the size

15 of that load?

16 A That was a 5,000-gallon load.

17 Q And when you say raw acid, do you know why

18 you were removing that?

19 A Yeah. Well, somewhere I know they broke

20 the valve off the tank, and they couldn't use it.

21 They had to put a new valve off the tank, and the

22 valve was at the bottom. So I went in there and

23 took the vacuum tank and took the plate off the top.

24 I could pump it out. So I had to pump that tank

1 empty, where they could put a new valve on it.

2 Q Okay. Any other companies you can recall?

3 A No, not offhand.

4 Q Do you recall hauling for R. R. Donnelly?

5 A Yeah. That's one down south there. What
6 is that? What is their location? South --

7 Q Is that Mattoon?

8 A Mattoon, yeah.

9 Q Was that the only facility of Donnelly you
10 hauled for?

11 A Yeah, that's the only one I remember.

12 Q What did you haul out of there?

13 A Thinner.

14 Q Do you recall how much?

15 A Yeah. Every time we went, we got 80 drums.
16 And I don't think we run more than a load a week out
17 of there, because some of the other drivers was
18 running out of there, too. I only remember going
19 there once.

20 I went there once because -- what happened?
21 I don't know. Some reason or another I got pulled
22 off the tank to go down there because some driver
23 didn't show up or something.

24 Q How about Ford Motor Company?

1 A Yeah. Well -- yeah, I can recollect. That
2 was empty drums we was hauling out of there. I
3 don't remember hauling no full drums. I remember
4 hauling empty drums out of there. And that must
5 have been in -- that was after we went to Paxton.
6 It had to be between '79 and around in there. I
7 don't remember no full drums.

8 Q Do you ever recall hauling any dirty
9 thinner out of there in the early '60s?

10 A Out of Ford?

11 Q Yes.

12 A No. I don't remember going to Ford until
13 around '79. We used to haul empty drums out of
14 there.

15 Q Do you recall hauling for a company called
16 Cargill?

17 A Cargill, yeah, I remember them.

18 Q Do you recall where they were located?

19 A Cargill -- they up north. What is that?

20 Q Carpentersville?

21 A Carpentersville.

22 Q And what did you haul out of there?

23 A Some sort of varnish resin they call it.

24 Q What?

1 A Some kind of varnish resin they called it.

2 Q Could it have been resins? Is that what --

3 A Yeah.

4 Q And how much did you haul out of there?

5 A Anywhere from three to four loads a week,
6 80 drums a crack. Where were their location?

7 Q Cottage Avenue and Lake Marion Road?

8 A Yeah. Well, should be another stop right
9 around the corner from them on the same street. I
10 don't know the name of it, but there should be
11 another one right around the corner from there.

12 Q International Minerals & Chemicals?

13 A Yeah, that's it. See, some of them I've
14 forgot, where if somebody calls the name of them I
15 can remember.

16 Q Okay. And do you recall what you took out
17 of International Minerals & Chemicals?

18 A Yeah. It was a dirty thinner. And that
19 was about 80 drums a week.

20 Q Do you recall any other companies?

21 A Um-um.

22 Q We mentioned Scholle or Scholle Chemical.

23 A Yeah.

24 Q Do you recall that?

1 A Yeah. What is their location?

2 Q North Avenue in Northlake.

3 A Yeah.

4 Q Do you recall what you picked up there?

5 A That was drums.

6 Q Do you know what was in the drums?

7 A Dirty thinner.

8 Q And do you recall how often you picked up
9 drums?

10 A I think that was once a week. Yeah, about
11 once a week, 80 drums.

12 Q Do you recall hauling for Interlake Steel
13 Company, Interlake Steel?

14 A We didn't haul for them, that I know of.

15 Q They're in Riverdale?

16 A Yeah. Well, they've got three. They've
17 got one in Riverdale. They've got one on 106th and
18 Torrence, and they've got another one in -- they've
19 got three locations. But I never hauled nothing out
20 of there, that I remember.

21 Q How about a company called People's Gas or
22 Institute of Gas Technology?

23 A That's over there on Pulaski?

24 Q Yes.

1 A Yep. I did a lot of work out of there.

2 Q Do you recall what you took out of there?

3 A Yeah. It was -- what the heck did they
4 call that? They used a lot of coal, and this here
5 was water and stuff -- I think they called it coal
6 dust water or something.

7 Q Coal dust water?

8 A Yeah.

9 Q Do you recall how much you hauled out of
10 there?

11 A I would say we were doing something like
12 five loads a week. We had them Vac-Alls in there.

13 Q How much would the Vac-All hold?

14 A Well, the Vac-All would pump it out of the
15 ground, and we'd pump it onto the tank. And they'd
16 be like 5,000 tanks. And they would have to pump it
17 out of the ground, out of the pit, and we'd have to
18 pump it up ourselves.

19 Q So, it would be five 5,000-gallons a week?

20 A Yeah.

21 Q Do you recall any stops in Calumet City?

22 A Yeah. We had two stops in Calumet City.
23 One of them we only was in there that one time,
24 because the stuff we pumped froze up in the tank.

1 We couldn't get it out of the tank. We had to cut
2 the tank open and take an air hose to get the stuff
3 open. And then they've got Big Ben, I believe.

4 Q Do you recall Big Ben Chemical?

5 A Yeah. They've got one in Calumet City, and
6 they've got one in Willow Springs.

7 Q Is there one on 18th and LaSalle?

8 A No. That moved. That's the one in Willow
9 Springs. Because when I first started driving, they
10 moved and -- down to Willow Springs. And then
11 you've got another stop right there. We was running
12 a load -- Enterprise Paint.

13 Q Would that be a drum load?

14 A Yeah, that was a drum load.

15 Q 80 drums?

16 A Yeah, about three times a week.

17 Q And what kind of waste would that be?

18 A That was thinner.

19 Q What kind of waste did you haul out of Big
20 Ben?

21 A Thinner.

22 Q Do you recall how much?

23 A Yeah. It's either one -- I'd say the one
24 on Willow Springs runs about two loads a week. The

1 one over there in Calumet City run about a load a
2 week.

3 Q Would those be drum loads?

4 A Yeah.

5 Q 80 gallons -- or I'm sorry, 80 drums?

6 A 80 drums a load, yeah.

7 Q Do you recall hauling for a company called
8 Ashland Chemical?

9 A Ashland Chemical? Yeah, Ashland Chemical.

10 Q Do you know where they were located?

11 A No. Let me think of where -- I can
12 remember the name of them, but the location is a
13 little off.

14 Q Would that be Calumet City?

15 A Yeah, they were in Calumet City.

16 Q 142nd and Paxton?

17 A Yeah, that's Calumet City. Yeah, that's
18 right.

19 Q Do you recall what you hauled out of there?

20 A Well, we hauled tankers and a drum load.
21 We got something like two drum loads a week out of
22 there and about three tank loads a week.

23 Q And what were the size of the tank loads?

24 A 5,000 gallons.

1 Q And the drum loads would be 80 drums?

2 A 80 drums, 80 drums.

3 Q Do you recall any other companies you
4 hauled for?

5 A No.

6 Q How about a company called Wyman Gordon?

7 A Wyman Gordon, yep. Wyman Gordon.

8 Q Do you recall where they were located?

9 A Um-um.

10 Q Would that be Harvey?

11 A Wyman Gordon? Yep. Around 100 and --
12 what? Well, that wouldn't be Pulaski. About 133
13 and --

14 Q 146th and South Wood?

15 A Yeah, South Wood. Because Ashland runs out
16 into Wood at 13- -- 127th where Ashland runs into
17 Wood.

18 Yeah, that was a tanker. And we were
19 running about two loads a week out of there. Yeah,
20 something like two loads a week out of there,
21 5,000-gallon loads.

22 Q Do you recall what was in the load?

23 A That was acid. Didn't they go out of
24 business or sold out somehow?

1 Q I don't know.

2 A I think they went out of business.

3 Q Are there any other company names or
4 locations you recall from your recollection,
5 Mr. Brown?

6 A There was a company right off of Route 51
7 and Halsted, big outfit. What was that? Around --
8 right off of Halsted there.

9 Q Before I leave Calumet City, do you recall
10 a customer called Cosden Oil?

11 A Who?

12 Q Cosden Oil?

13 A Um-um. Wait a minute. Could that have
14 been the one where the tank froze up on us?

15 Q Do you recall the location of the one where
16 the tank froze up?

17 A Yeah. Right off the expressway, right
18 across the road from C.I.D.. What was the name of
19 that? Some kind of chemical company. But I forgot
20 the address and the name of it. But I don't think
21 that was about one of my second stops. I don't
22 remember.

23 Q Do you recall any other stops here in the
24 city, in Chicago?

1 A No, not offhand. We never run a whole lot
2 of stuff in Chicago. Most of it was suburban. We
3 had a paint company on the North Side around 1700
4 North. Have you got a paint company in there on the
5 North Side that would be 1700 North something? What
6 the hell was that? North Avenue and --

7 Q Let me do this. Let me -- I'll read some
8 names and locations of companies, and tell me if you
9 recall them as customers. Okay?

10 A Okay.

11 Q Do you recall a customer called A. E.
12 Staley, in Lemont, Illinois?

13 A Oh, yeah. Yeah, I remember them.

14 Q Okay. What do you recall about them?

15 A Well, that was a vacuum tank load, and I
16 would say -- I'd say about three loads a week,
17 5,000-gallon loads.

18 Q Do you recall what you hauled out of there?

19 A Yeah. They was a -- a recycling place.
20 They recycled chemicals, and this here was the waste
21 from that. And we -- it wasn't that -- you could
22 call it thinner, but there was no flammable stuff,
23 you know. I don't get what we call it now, but we
24 didn't call it thinner, because it wasn't flammable.

1 Flammable, they called it dirty thinner.

2 Q So, if the waste was flammable, you
3 described it as dirty thinner?

4 A Yeah.

5 Q How would you know if it was flammable?
6 How would you know whether it was flammable or not?

7 A Well, the company would tell you, you know,
8 no smoking and this kind of thing. That's the first
9 thing the company tells you. And then that's what
10 you would have to put on there. They would have
11 that on the drum, flames. They had the stickers on
12 the drums so you wouldn't make no mistake and smoke.

13 Q Do you recall a customer called Active
14 Services Company?

15 A No.

16 Q How about Adolph Plating?

17 A I don't remember them either.

18 Q How about a company called Alton Boxboard
19 Company?

20 A Yeah, I remember them.

21 Q Do you recall where they were located?

22 A No, I can't remember where they were
23 located.

24 Q Would it have been Bedford Park?

1 A Yeah, they -- that's it. Bedford Park.

2 Q Do you recall what you picked up there?

3 A Yeah. That was a -- some of that dirty
4 thinner.

5 Q And you recall how much you picked up
6 there?

7 A One load a week, 80 drums.

8 Q How about a company called American
9 Printers?

10 A I don't know about them. I can't remember
11 what that stop was, how big it was, or their
12 location.

13 Q Okay. How about a company called Apeco or
14 Apeco?

15 A Um-um, I don't remember them either.

16 Q That would be a company located in Evanston
17 on Dempster.

18 A Oh, that would be the company where I was
19 only there one time. There was a company in
20 Evanston I only was there one time. I think I
21 picked up two loads that had 45 drums a load. That
22 would have to be the place.

23 Q What was in the load?

24 A Thinner was in the load. But I was only

1 there twice.

2 Q Do you recall a company called Armstrong or
3 Elliott Paint?

4 A Elliott? Yeah, I remember them.

5 Q Do you recall where they were located?

6 A Elliott in Chicago, ain't it?

7 Q Would that be 1330 South Kilbourn in
8 Chicago?

9 A Yeah.

10 Q Do you recall what you picked up there?

11 A That was thinner.

12 Q Do you recall the size of the load?

13 A 80 drums, about once a week.

14 Q How about a company called Bagcraft
15 Corporation?

16 A That's one up on -- I heard talk of it, but
17 I don't remember going there.

18 Q You heard other drivers talk about it?

19 A Yeah.

20 Q Do you know anything about what they picked
21 up there?

22 A No, I don't.

23 Q Do you recall a customer called Barker
24 Chemical?

1 A Yeah.

2 Q Do you recall where they were located?

3 A Barker Chemical is -- are they in Bedford
4 Park?

5 Q I have an address of 700 East 138th Street
6 in Chicago.

7 A Say that again.

8 Q 138th Street in Chicago.

9 A Oh, yep, yep, right.

10 Q Does that refresh your recollection?

11 A Yeah. I remember now.

12 Q Do you recall what you picked up there?

13 A Yeah. That was a thinner.

14 Q Do you recall the size of the load?

15 A One load of about 80 drums a week. But --
16 that outfit got two or three places, right?

17 Q I'm not familiar with them.

18 A It seems like when I went the first time I
19 went out, I got mixed up, and I went to the wrong
20 plant, and they sent me over there.

21 Q Do you recall a company called Barrett
22 Varnish in Cicero?

23 A 16th Street?

24 Q This would be South 50th Court.

1 A In Cicero?

2 Q In Cicero.

3 A Yeah, yeah. Okay.

4 Q And do you recall what kind of waste you
5 picked up there?

6 A Yeah, that was thinner, too. I remember
7 now. Yeah, because Cicero, the streets is so goofy
8 from Chicago.

9 Q Do you recall how much you picked up there?

10 A Well, yeah. Because it wasn't making --
11 when we first started, they had a back up. Some guy
12 had quit hauling it, and I guess they tried to get
13 his price down or something. They backed up quite a
14 bit before. Then the fire department got on them to
15 move it or something.

16 And when I first started there, we were
17 running four or five loads a day out there until we
18 caught up. Yeah, I remember now.

19 Q What did you haul out of there? Drums or
20 tanks?

21 A Drums, drums.

22 Q How many drums?

23 A We'd haul 80 drums at a crack.

24 Q And once you got the initial backlog

1 cleared up --

2 A Then we was down to a load a week.

3 Q Do you recall hauling for a company called
4 Blaw-Knox Foundry in East Chicago?

5 A No.

6 Q No?

7 A No, I don't remember that one.

8 Q How about a company called Boyle-Midway?

9 A Yeah. The location of it, I can't recall.

10 Q Do you recall what you picked up there?

11 A It seems like we hauled a vacuum tank out
12 of there. About 5,000 gallons in the vacuum tank.

13 Q How often?

14 A About two loads a week.

15 Q Do you know what you hauled?

16 A I think I would consider that acid, water
17 and acid.

18 Q Do you recall a company called Brett Ford
19 Manufacturing in Schiller Park?

20 A Yeah. But they -- I don't think we got
21 over one load out of them, maybe two. And they were
22 drums.

23 Q Do you know what was in them?

24 A Thinner.

1 Q And how much did you haul out of there?

2 A I would say all told, I could remember --
3 before I could remember, we only got two loads out
4 of there at 80 drums a load out of there. So, I
5 don't know. Something went sour with the deal some
6 kind of way.

7 Q How about a company called C. P. Clare on
8 West Pratt in Chicago?

9 A I don't remember them.

10 Q How about a company called C. P. Hall at
11 7300 South Central Avenue in Chicago?

12 A Yeah, I remember them. That was drums.
13 They had -- I think the stuff in there was something
14 like asphalt they was making, something like that,
15 and that's what they put in them drums.

16 Q What was it?

17 A Something like asphalt, like you put on the
18 highways. I think that's what they made there.
19 Because I remember those drums would be so heavy.

20 Q How much would you pick up from there?

21 A Oh, we'd pick up 80 drums about once a
22 week.

23 Q Do you recall a company called Central
24 Solvents & Chemicals on West 26th Street?

1 A Um-um.

2 Q How about a company called Chase Products
3 or Chase Brass?

4 A No, I don't remember that, either.

5 Q How about a company called Chicago Decal?

6 A Yeah, I remember them. That was about 60
7 drums a week.

8 Q Do you recall where they were located?

9 A No.

10 Q Do you know what -- I'm sorry.

11 A No, I don't remember the location that they
12 were.

13 Q Do you know what was in the drums?

14 A Thinner.

15 Q How about a company called Chicago Name
16 Plate Company?

17 A Yeah, I can remember them. That was
18 another one of those small stops that we made.

19 Q Do you recall where they were located?

20 A No.

21 Q Do you recall what you hauled out of there?

22 A Them was drums. I would say it had to be
23 about 60 drums a week.

24 Q And do you know what was in the drums?

1 A That would be thinner.

2 Q Do you recall hauling for a company called
3 Chicago Rawhide?

4 A Chicago Rawhide? That would be down on
5 40-something, wouldn't it? Isn't that what they
6 call the stockyard?

7 Q Could that be Chicago Sheepskin?

8 A Yeah.

9 Q Would that be 4000 South Packers?

10 A That's it.

11 Q What did you haul out of there?

12 A Well, they call it cow piss. I know it
13 would freeze up in the wintertime. That's what they
14 called it. I don't know.

15 Q Would that be drums or a tanker?

16 A That was a tanker.

17 Q And 5,000-gallon tanker?

18 A No, that would be 4,000-gallon, because
19 we'd switch tanks then. We didn't use a vacuum tank
20 then.

21 Q How often would you pick a load up?

22 A Once a week. I remember we had trouble
23 getting it out in the wintertime. It would freeze
24 up. They called it cow piss.

1 Q How about a company called Chrome-Rite?

2 A Chrome-Rite?

3 Q On West Arthington in Chicago.

4 A Um-hum.

5 Q Do you recall them?

6 A Yeah.

7 Q Do you recall what you picked up there?

8 A Yeah. That was acid stop, about 5,000
9 gallons a week.

10 Q How about a company called Chicago
11 Rotoprint, 4600 West Belmont?

12 A I never was there. I heard the drivers
13 talking about it, though, but I never was there.
14 That guy was a smaller stop, too.

15 Q Okay. How about a company called Commander
16 Packaging in Lisle?

17 A Never went there either. I heard them
18 talking about that.

19 Q You heard the drivers talking about that?

20 A Yeah. I'm trying to figure what did they
21 tell me about that stop. It's like they was -- had
22 to be a trailer load.

23 Q Why was that?

24 A Because the guy that was doing the talking,

1 as far as I can remember, that's what he pulled,
2 drums.

3 Q Do you recall a customer called Container
4 Corporation in Carol Stream?

5 A Yeah. Yeah, I remember them.

6 Q What did you haul from them?

7 A Thinner.

8 Q And how much?

9 A Oh, I think we was getting something like a
10 load a week out of there.

11 Q Is that a drum or a tanker load?

12 A That was drums.

13 Q 80 drums?

14 A Yeah. So they moved out of Chicago. They
15 used to be down on 35th, right there across from
16 Spiegel, Spiegel on one side and them on other.

17 Q Do you recall a customer called Corn
18 Products Company?

19 A No.

20 Q Do you recall a customer called Crown Cork
21 & Seal Company?

22 A Yep. I was there, and let me get the
23 location. Let's see. That's Chicago, ain't it?
24 That's what I thought.

1 Q Do you recall what you picked up there?

2 A Near as I can remember, it was drums, and
3 that had to be, I'd say, about one load a week at
4 80 drums.

5 Q Do you know what was in the drums?

6 A Thinner.

7 Q How about a customer called Culligan
8 Company?

9 A Yeah. That's up in -- up around Waukegan,
10 isn't it?

11 Q Northbrook?

12 A Yeah. That was a small stop. Let's see.
13 It seems like when I went there, we only got -- I
14 think it was once a week. I think you only got
15 something like 15 drums out of there. Yeah, I think
16 it was only like 15 drums, 55 gallons, a week out of
17 there.

18 Q Do you know what was in the drums?

19 A No, I don't. Because that stuff, all we
20 was mixing it with some other stuff. Like they'd
21 have two, three small stuff. They'd put them all
22 together.

23 Q Do you recall a customer called Cuneo
24 Press?

1 A Cuneo Press? No, I don't remember him,
2 either.

3 Q How about Custom Organics?

4 A No.

5 Q Danley Machine Company?

6 A No.

7 Q Dap Ink?

8 A No.

9 Q Daubert Chemical?

10 A Daubert Chemical? Yeah, I remember them.

11 Yeah, they was pretty good sized. We was good for a
12 load a week out of there, drums.

13 Q 80 drums a week?

14 A Yeah.

15 Q Do you know what you picked up there?

16 A They called it thinner.

17 Q Do you know where they were located?

18 A No. Is they in Chicago? They're in
19 Chicago somewhere, aren't they?

20 Q I'm not sure. Do you recall a customer
21 called DeMert and Dougherty?

22 A No.

23 Q In Cicero?

24 A No, I don't remember them.

1 Q How about a customer called Dreeblan Paint
2 Company?

3 A Dreeblan Paint? Yep.

4 MR. DECKER: How do you spell that?

5 MR. KOWALSKI: D-r-e-e-b-l-a-n.

6 BY MR. KOWALSKI:

7 Q And do you recall where they were located?

8 A They were in Chicago, but their location, I
9 don't know where that is.

10 Q And do you know what you picked up there?

11 A Thinner.

12 Q And do you recall how much?

13 A Yeah. That was about 80 drums a week.

14 Q Do you recall a customer called Du Pont?

15 A Du Pont? I heard them talking about it,
16 but I don't remember who was -- that was some of the
17 dispatchers or one of the drivers talking about it.

18 Q How about a company called Echo Products?

19 A No, not that I know of.

20 Q How about Electronic Plating?

21 A No.

22 Q Elliott Paint?

23 A Elliott Paint? Yeah, I was there.

24 Q Do you recall where they were located?

1 A They in Chicago, too, somewhere.

2 Q Do you recall what you picked up there?

3 A That was thinner. And now, let's see.

4 They should have been -- should be about 80 drums a
5 week out of that place.

6 Q How about a company called Englander
7 Mattress Company?

8 A I don't remember them.

9 Q How about a company called Fiber Bond?

10 A Yep, I remember them.

11 Q Do you recall where they were located?

12 A Well, they had one plant on 30 --
13 30-something South Kedzie. Then they've got another
14 one out on 130th and Pulaski. Well, out there, they
15 call it Crawford. Them are the only two I was in.
16 But they've got another one on 65th out near Ogden,
17 but I was never in them. I was in only them two.

18 Q Okay. Do you recall what kind of waste you
19 picked up there?

20 A I don't know what the hell they would call
21 that stuff. It looked like milk. It wasn't no
22 thinner. The stuff wasn't even flammable.

23 Q Okay.

24 A So I don't know what the devil you would

1 call it.

2 Q Okay. Do you recall how much you picked up
3 there?

4 A Yeah. We was picking up -- the one on 30,
5 we were picking up three or four loads a week. They
6 would store it in a railroad tanker, and we'd pump
7 it out of there. Sometimes we'd maybe -- if we had
8 the time, we'd go there, and sometimes we'd get five
9 loads. And maybe next week we'd go, we'd get two
10 loads, depending on how much time we had to get
11 them. You know, we just kept the tanker where it
12 could work. And if we got to running light, then
13 we'd clean it out.

14 Q So, when you say you'd get five loads,
15 you'd fill your tanker up five times?

16 A Yeah.

17 Q Okay. And that's a 5,000-gallon tanker?

18 A Yeah. And since you're talking about them,
19 that's right. It was right in that bottom was a
20 steel mill, too. What the hell was it? On Kedzie.
21 Between 34th and 33rd and Kedzie. There should be a
22 steel mill in there. We used to haul a hell of a
23 lot of acid out of there. Don't ask me to name it,
24 but I know it's in there.

1 Q A steel company between 33rd and 35th on
2 Kedzie?

3 A Yep. In there around Fiber Bond.

4 Q Well, let's finish up here with Fiber Bond.
5 So, you hauled three to four loads per week,
6 generally, out of the 33rd and Kedzie facility?

7 A Yeah.

8 Q How much did you take out of the one on
9 Pulaski?

10 A The one on Pulaski? Well, that was a drum
11 stop. You'd get 80 drums a week out of there.

12 Q Okay.

13 (Short interruption.)

14 MR. KOWALSKI: Back on the record.

15 BY MR. KOWALSKI:

16 Q Mr. Brown, do you recall a customer called
17 Flint Ink Company in Broadview?

18 A Yeah.

19 Q Do you recall what you picked up there?

20 A Yeah. That was thinner.

21 Q Do you recall how much you picked up?

22 A Yeah. Flint Ink, I would say we was
23 averaging about a load a week, averaging about 80
24 drums a load.

1 Q Do you recall a customer called Frederick
2 H. Levey Ink Company?

3 A Who?

4 Q Frederick H. Levey Ink Company.

5 A No, I don't recall them.

6 Q How about a customer called Fox Valley
7 Manufacturing?

8 A Yeah, I remember them.

9 Q Do you recall where they were?

10 A Wasn't they in Elgin or somewhere out that
11 way?

12 Q In Elgin.

13 A Yeah.

14 Q And do you recall what you picked up there?

15 A Drums, about 80 drums a load, and I would
16 say a load a week.

17 Q And do you know what was in the drums?

18 A Thinner.

19 Q Do you recall a customer called Furnas
20 Electric?

21 A No.

22 Q Do you recall any customers in Batavia,
23 Illinois?

24 A Batavia? Yeah. I went there a couple of

1 times, yeah. Now I remember Batavia. What did you
2 say the name of the company was?

3 Q Furnas Electric.

4 A Yeah, could be. Yeah, they had acid. We
5 had to clean their tank. Batavia. I forgot about
6 that. That was a nice place to go.

7 Q How much did you pick up there?

8 A 10,000 gallons, because we used two tanks
9 each time we went.

10 Q Would that be per week?

11 A Yeah.

12 Q How about a customer called the Georgia
13 Pacific Company?

14 A No, I don't recall them.

15 Q How about a customer called Glidden Paint
16 Company?

17 A That's the one I was trying to name a while
18 ago. That's 1700 North what?

19 Q 1800 North LeClaire?

20 A Yeah, that's it. I tried to recall the
21 name of it a little while ago.

22 Q And do you recall what you picked up there?

23 A Thinner.

24 Q And how much?

1 A Well, 80 drums a crack. But sometimes I
2 got two loads a week out of it, and sometimes I got
3 one. I would say we run about -- say about six
4 loads a month out of there. And they also
5 delivered, too, some drum loads.

6 Q They would bring them down themselves?

7 A Yeah.

8 Q Where would they deliver those to? To the
9 U.S. Scrap site?

10 A Yeah, U.S. Scrap site.

11 Q Do you recall Good Humor Company being a
12 customer?

13 A Good Humor? Yeah.

14 Q Do you recall what kind of waste they --

15 A That was all of that ice cream, then ice
16 cream bars. Yeah, I remember them well, because
17 they used to give me ice cream. We'd get those Good
18 Humor bars, and I'd get back to the company, and it
19 would be all over the truck, melted.

20 Q Do you recall a customer called Graftec
21 Press?

22 A That's one I don't remember.

23 Q How about Graphon, Incorporated?

24 A I remember that one, but not the location,

1 I don't.

2 Q Franklin Park?

3 A Yeah.

4 Q Do you recall what you picked up there?

5 A Acids, because I had to pump it through the
6 wall. That was acid.

7 Q Do you recall how much?

8 A That was a 5,000-gallon trip.

9 Q Would that be per week?

10 A Yeah.

11 Q Do you recall a company called W. F. Hall
12 Printing?

13 A Um-um.

14 Q How about a company called Hanna Waterways
15 in Lemont?

16 A Hanna Waterways? Yeah.

17 Q Do you recall what you picked up there?

18 A That was some sort of thinner.

19 Q And do you recall how much?

20 A Yeah. We was getting -- I think we was
21 running about two loads a week out of that vacuum
22 tank, 5,000-gallon.

23 Q Do you recall which street or streets that
24 was located on?

1 A No. I would go down Archer Avenue, and
2 then the street I'd turn off on, what is it, a dirt
3 road. The location of the plant was a dirt road.
4 Now, I don't know what the main address was.

5 Q Was it right off of Archer?

6 A Yeah, it was right off of Archer.

7 Q Okay. Do you recall a customer called
8 Hendrickson Manufacturing in Lyons?

9 A No.

10 Q How about a company called Heritage Ink?

11 A Who?

12 Q Heritage Ink, in Addison?

13 A No, I don't remember that.

14 Q How about a company called Hills-McCanna?

15 A No, I don't remember that either.

16 MR. DECKER: What was the name again?

17 MR. KOWALSKI: Hills-McCanna, M-c-C-a-n-n-a.

18 BY MR. KOWALSKI:

19 Q Do you recall a customer call Hodson
20 Corporation?

21 A No, I don't remember them, either.

22 Q How about a customer called E. F. Houghton
23 Corporation?

24 A Them, I don't remember.

1 Q Do you recall a customer call
2 Hoener-Waldorf?

3 A No.

4 Q That would be in Joliet.

5 A No.

6 Q Do you recall Hotpoint division of General
7 Electric being a customer?

8 A Yeah, I remember that.

9 Q Do you recall where they were?

10 A No.

11 Q Could it have been Cicero?

12 A It could have been. It had to be in
13 Cicero.

14 Q Do you recall what kind of waste you got
15 there?

16 A Something like waste varnish.

17 Q Waste varnish?

18 A Yeah, waste varnish.

19 Q And how much did you pick up?

20 A Well, we -- about a trailer load a week at
21 80 drums.

22 Q Do you recall a customer called Howell
23 Company?

24 A Howell? Howell Company? Um-um -- no.

1 Q Do you recall any customers in St. Charles?

2 A St. Charles? No, I don't remember them.

3 Q How about a customer called ITT Harper
4 Corporation?

5 A Nope, I don't remember them, neither.

6 Q Do you recall a company called Illinois
7 Bronze Coatings in Lake Zurich?

8 A Yep, I remember them.

9 Q Do you recall what kind of waste you picked
10 up there?

11 A Yeah. That was a -- some more like acid.

12 Q Do you know how much?

13 A We were getting a tanker a week out of
14 there, the way I remember.

15 Q 5,000-gallon tanker?

16 A Yeah.

17 Q Do you recall a customer called Industrial
18 Hard Chrome?

19 A Yeah. They were -- are they in Elk Grove
20 Village? Yeah. That was an acid shop, about 4,000
21 gallons a week.

22 Q How about a company called Illinois Tool
23 Works on Higgins Road in Chicago?

24 A Where about?

1 Q Higgins Road, 8500 West?

2 A No, I don't remember that one, either.

3 Q How about a company called Jett Dye
4 Castings?

5 A No.

6 Q Jewel Paint Company?

7 A Who?

8 Q Jewel Paint Company?

9 A No, I don't remember that one, either.

10 Q How about LaSalle Management Company?

11 A Nope, I don't remember that one.

12 Q Do you recall a customer called Leavitt
13 Tube Company?

14 A Yeah, I remember that one.

15 Q Okay. Do you recall where they were
16 located?

17 A There were two. They were where? They in
18 Bedford Park, ain't they?

19 Q This company would be in Chicago, West
20 115th Street.

21 A Oh, West 115th, right off the -- 57, yeah.
22 That was an acid stop. Now it comes to me. Right
23 off of -- right off -- just across the U.S. 57. And
24 we had another stop right down the street from them,

1 too.

2 Q Do you recall how much acid you picked up
3 at Leavitt?

4 A About 5,000 gallons a week.

5 Q Do you recall a customer called Libby
6 MacNeal Libby?

7 A Yeah. That food place right down there,
8 yeah.

9 Q Did you pick up anything up there besides
10 food waste?

11 A No.

12 Q How about a company called MacLean-Fogg in
13 Mundelein?

14 A Yeah. That was a thinner load. Yeah, I
15 remember that one.

16 Q How much did you pick up there?

17 A That was about 4,000 gallons a week,
18 because we had a tank sitting there. That was a
19 switch.

20 Q Do you recall a customer called Magee
21 Chemical or Kerr-Magee Chemical in Des Plaines?

22 A Yeah, Des Plaines.

23 Q Do you recall what you picked up there?

24 A That was thinner. Them was drums. We'd

1 get about 80 drums a week out of there.

2 Q Do you recall a customer called Marathon
3 Oil Company?

4 A I don't remember them.

5 Q How about Martin Senour Paint Company?

6 A Yeah, I remember them.

7 Q Where were they located?

8 A It's in Chicago somewhere.

9 Q Do you recall --

10 A The exact address, I don't know.

11 Q Do you recall what you picked up there?

12 A Dirty thinner.

13 Q And how much?

14 A About a load a week, about 80 drums a week.

15 Q Do you recall a company called Matherson
16 Selig?

17 A No, I don't remember that, neither.

18 Q How about McGraw-Edison?

19 A No.

20 Q Midwest Brass?

21 A Midwest Brass. Would that be in
22 Bensenville -- not Bensenville -- I remember. It's
23 out west, out of the city, ain't it?

24 Q In Franklin Park?

1 A Yeah.

2 Q Do you recall what you picked up there?

3 A Acid.

4 Q And do you recall how much?

5 A I would say about 4,000 gallons a week.

6 Q Do you recall any stops in Kankakee?

7 A Kankakee? Yeah, we had a stop down there
8 in Kankakee. Paint company. What was the name of
9 it. I remember one stop we had in Kankakee, but I
10 can't recall the name of it.

11 Q Do you recall which street it was on?

12 A Hum?

13 Q Do you recall which street?

14 A No. Oh, boy.

15 Q Do you recall a customer called Mobil
16 Company down there?

17 A Mobil Company? That would have to be the
18 one, because we only had -- I only remember one stop
19 we had in Kankakee.

20 Q What did you pick up there?

21 A Drums.

22 Q What was in the drums?

23 A Thinner.

24 Q How many drums did you pick up?

1 A 80.

2 Q Per week?

3 A Yeah.

4 Q Do you recall anything else about that
5 stop?

6 A That was a -- let's see. I was bringing a
7 drop once I went out there, and we got stopped
8 because we didn't have no license plate on the
9 trailer. This trooper stopped us, and the guy got
10 out and put the plate on. I don't know anything
11 else about it.

12 Q If we got in a car today, could you drive
13 down there?

14 A Yeah.

15 Q Do you recall a customer called Motive
16 Industries?

17 A Motor Industries? Yeah, I remember them.
18 I think, if I'm remembering right, they should be in
19 Bedford Park, ain't they?

20 Q This company's on 5200 North Roosevelt in
21 Chicago.

22 MR. DECKER: North Roosevelt?

23 THE WITNESS: What?

24 MR. DECKER: No, west.

1 MR. KOWALSKI: It has to be west.

2 BY MR. KOWALSKI:

3 Q This is on Roosevelt Road in Chicago.

4 MR. DECKER: 5200 West.

5 BY MR. KOWALSKI:

6 Q 5200 West. Does that location sound
7 familiar?

8 A 5200 West Roosevelt Road? Let's see. That
9 would be in Cicero, wouldn't it? That might be in
10 Chicago. 5200 Roosevelt Road won't be in Chicago.

11 Q I think that would still be Chicago.

12 A No. You go on Roosevelt Road, when you
13 cross Cicero, you're out of Chicago. And that would
14 be in Cicero.

15 Q Do you recall any stop --

16 A Yeah, right at the -- like that -- by the
17 Eisenhower.

18 Q What did you pick up there?

19 A Drums.

20 Q Full of what?

21 A It would be thinner.

22 Q How much did you pick up?

23 A Well, that was a long time ago. I would
24 say about 60 drums a week, because that was still

1 one of the smaller loads.

2 Q Do you recall a company called Motorwheel
3 Corporation?

4 A No, that one, I can't remember.

5 Q Mendota, Illinois?

6 A What?

7 Q Mendota.

8 A No.

9 Q How about a customer called Namsco in
10 Bellwood?

11 A No.

12 Q Do you recall a customer called Nashua?

13 A No, I don't remember them, either.

14 Q Do you recall picking up any waste from any
15 government Nike Silo sites?

16 A Yeah, two. One would be Jackson Park, I
17 guess. It would be over there around 60-something,
18 over there, and then one up on the North Side, right
19 off Lake Shore Drive.

20 Q Would that be 31st and Lake Shore Drive?

21 A Yeah, somewhere along there.

22 Q Okay. What did you pick up there?

23 A Some sort of oil. They called it cooling
24 oil for the guns or something. I really don't know.

1 I don't think it was flammable.

2 Q How much did you pick up?

3 A Well, all told, I'd take -- with the two --
4 we picked the two stops up together. I think we
5 ended up with about 5,000 gallons, close to 5,000
6 gallons. I would say about four or 5,000 gallons to
7 each stop.

8 Q Was that a one-time pick-up?

9 A That was a one-shot deal.

10 Q Do you recall a company called Penn-Dixie
11 Steel?

12 A No, I don't remember them.

13 Q How about National Steel Container?

14 A No, I don't remember them, neither.

15 Q Do you recall a customer called
16 Pierce-Stevens Chemical in Carol Stream?

17 A Carol Stream?

18 MR. DECKER: What was it again?

19 MR. KOWALSKI: Pierce, P-i-e-r-c-e, Stevens.

20 BY THE WITNESS:

21 A I don't remember but that one place in
22 Carol Stream.

23 BY MR. KOWALSKI:

24 Q How about a customer called Pittsburgh

1 Metals?

2 A Pittsburgh Metals? That's one I can't
3 remember either.

4 Q How about Precision Twist Drill Company in
5 Crystal Lake?

6 A Yeah, I remember that one. That was a --
7 sort of a small stop, about -- oh, I'd say about
8 4,000 gallons a week out of that place.

9 Q And what was the nature of that waste?

10 A You know, I would say thinner. One of them
11 was thinner. It was a two-compartment tank we used
12 up there, and there were two different chemicals,
13 because you couldn't mix them for some reason. One
14 of them was thinner, and I don't know what the other
15 one could have been, because it couldn't be mixed.

16 Q Do you recall a customer called
17 Proler-Chicago at 36th and California?

18 MR. DECKER: Pro, P, as in Peter?

19 MR. KOWALSKI: P-r-o-l-e-r.

20 BY THE WITNESS:

21 A No.

22 BY MR. KOWALSKI:

23 Q How about a customer called R. A. Briggs in
24 Lake Zurich?

1 A Yeah, I remember them.

2 Q What did you pick up there?

3 A That was thinner.

4 Q Do you recall how much?

5 A I would say we was running about a load a
6 week at 80 drums.

7 Q Do you recall a customer called R-Lite
8 Chemical Coatings in Geneva?

9 A I remember Geneva, but I don't remember
10 that stop.

11 Q How about a customer called Reflector
12 Hardware?

13 A Yeah. I remember them.

14 Q What did you pick up there?

15 A That would have been thinner, too.

16 Q Do you recall where they were located?

17 A No.

18 Q Do you recall how much?

19 A If I ain't mistaken, we'd get a load a week
20 out of there or something like that.

21 Q Do you recall a customer called Reichhold?

22 A No, uh-uh.

23 Q How about Reliance Electric?

24 A No, I don't remember them.

1 Q Remington Arms Company?

2 A Who?

3 Q Remington Arms Company, a gun manufacturer?

4 A No.

5 Q How about a company called Resins, Solvents

6 & Varnishes in Chicago Heights?

7 A Yeah, I remember that one.

8 Q And what did you pick up there?

9 A Thinner. It was -- yeah, they were
10 thinner.

11 Q Do you recall how much?

12 A Over the week, about 80 drums a week, I
13 guess.

14 MR. DECKER: 80 what?

15 THE WITNESS: About 80 drums a week, then
16 55-gallon drums.

17 BY MR. KOWALSKI:

18 Q Do you recall a company called Revere
19 Brass?

20 A No, I don't remember that one.

21 Q How about Richardson Graphics?

22 A I don't remember that one, either.

23 Q Roper Manufacturing?

24 A Roper Manufacturing? Um-um.

1 Q How about Shakeproof?

2 A Who?

3 Q Shakeproof in Elgin?

4 A In Elgin? I can't place that one.

5 Q How about a company called Scott,

6 Incorporated?

7 A No, I don't remember that one, either.

8 Q Signode?

9 A Signal?

10 Q Signode.

11 A No.

12 Q That would be in Bridgeview. How about

13 Sigoli Metal Plating?

14 A No, I don't remember them.

15 Q Sinclair and Valentine?

16 A Sinclair and Valentine. I remember that

17 one. Now let's get the location. Let's see. Where

18 were they located at?

19 Q South Pulaski in Chicago, 4100?

20 A Yeah. That was -- them were drums. And

21 that was 80 drums a load, and it averaged about two

22 loads a week. They were right off the Stevenson.

23 Q Just off the Stevenson Expressway?

24 A Um-hum.

1 Q Do you recall what was in the load?

2 A Thinner.

3 Q Do you recall a customer called Size
4 Control?

5 A Size Control? No, I don't remember that,
6 but I heard them talking about that.

7 Q Okay. How about Skil Power Tool?

8 A No, I don't know about that one.

9 Q How about Sommer and Maca?

10 A No.

11 Q Do you recall a company called Specialty
12 Coatings?

13 A Yep.

14 Q What did you pick up there?

15 A That was thinner. And -- wait a minute.
16 Yeah, that was thinner.

17 Q Do you recall where they were located?

18 A No, I don't.

19 Q How much would you pick up there?

20 A Oh, I would say -- if I can remember, they
21 should have been about 80 drums a week.

22 Q Do you recall a company called Spot Nails?

23 A Yep.

24 Q Where were they located?

1 A They were up in -- what's the name of that
2 little old town. That's right up side O'Hare Field,
3 by one of those small towns.

4 Q Rolling Meadows?

5 A Rolling Meadows, right.

6 Q And what did you pick up there?

7 A I think we hauled drums out of there, about
8 80 drums a week.

9 Q Do you recall a company called Stewart
10 Chemical Paint Company?

11 A No.

12 Q How about Stein-Hall?

13 A No. I heard them talking. I never was
14 there, either.

15 Q Stuart Oil Company?

16 A Who?

17 Q Stuart Oil Company?

18 A Nope.

19 Q What about Texaco Company in Lockport?

20 A I don't remember, no. They done a clean-up
21 job there, but I wasn't in on that detail. That was
22 the Vac-All on that job.

23 Q Do you recall what kind of clean-up they
24 did?

1 A Well, they cleaned up some tanks. They had
2 some old tanks there, and they cleaned them out to
3 store it. That was during the -- when the gas would
4 have been short in '76, they done a job out there
5 for them. They had them Vac-All. They cleaned out
6 a bunch of tanks to store the stuff, store the fuel
7 in. I don't know anything about it. I heard them
8 talking about it. I heard them talking, but I
9 didn't go there.

10 Q You never went there yourself?

11 A No.

12 Q But you were aware that some of the U.S.
13 Scrap employees --

14 A Yeah. They had the vacuum tank boys out
15 there.

16 Q Was that before you were a vacuum tank
17 driver yourself?

18 A Well, these here were different. They call
19 them Vac-All. You see, they got them to pump out
20 these sewers. They've got four of them. They
21 called them Vac-All.

22 Q So, a Vac-All is different than a vacuum
23 tanker?

24 A Yeah. Vacuum tanker won't pick up -- those

1 things they pick up like dirt. They use them to
2 clean up buildings when they put up buildings with
3 the roof up there. They used to clean up a lot of
4 roofs with them.

5 Q Do you recall a customer called
6 Baxter-Travenol or Travenol?

7 A No.

8 Q How about Thor Power?

9 A No.

10 Q Thompson Heywood Chemical Company?

11 A No.

12 Q Triple S Etchants?

13 A Who?

14 Q Triple S Etchants?

15 A No, I don't remember them, either.

16 Q How about U.S. Reduction Company?

17 A U.S. Reduction? No.

18 Q Do you recall ever hauling a load of
19 aluminum dust from a company in East Chicago or
20 anyone doing that?

21 A Aluminum dust, East Chicago? Um-um. I
22 don't remember doing no work out of East Chicago.

23 Q Okay.

24 A I don't know who done that.

1 Q We talked earlier about the raw acid that
2 you picked up out of U.S. Steel on the South Works
3 here. Are you aware of any other pick-ups from any
4 of the other U.S. Steel facilities, either in Gary
5 or in Dolton?

6 A No. That was the only one I remember going
7 to.

8 Q How about a customer called Union Camp?

9 A No, I don't remember them, either.

10 Q Do you recall a customer called United
11 Wallpaper?

12 A Yep. That was a location over there on --
13 they located on Kedzie, ain't they?

14 Q That's right. 31st and Kedzie?

15 A Yeah. They're right in there around Fiber
16 Bond.

17 Q What did you pick up from them?

18 A Thinner. That was a small stop, like
19 maybe, say, 20 drums a week.

20 Q Do you recall a customer called Vandercook?

21 A Who?

22 Q Vandercook?

23 A No.

24 Q How about Velsicol Chemical?

1 A Yeah, I remember them.

2 Q Do you recall where they were located?

3 A Velsicol? The location's got me, but I
4 remember the company.

5 Q Do you recall what you picked up there?

6 A They were drums. I would say about 80
7 drums a week.

8 Q Do you know what was in the drums?

9 A Thinner.

10 Q How about a company called Venus
11 Laboratories, in Wood Dale?

12 A No, I never went there.

13 Q Do you recall a customer called Victor
14 Gasket?

15 A Yeah. Victor Gasket, where are they
16 located? The location, I can't give you.

17 Q Okay. Do you recall what you picked up
18 there?

19 A Drums. It wasn't a very big stop, either.
20 I would say we would get about 60 drums a week out
21 of there.

22 Q Do you know what was in the drums?

23 A Thinner.

24 Q Do you recall a customer called W. C.

1 Richards?

2 A W. C. Richards? No. Where are they
3 located?

4 Q I don't know.

5 A W. C. Richards? That's got to be the
6 outfit I was talking about in lock Rockford. That's
7 got to be the same outfit. Because it was
8 W.-something that we hauled acid out of there. They
9 made nuts and bolts. That's got to be the same
10 place. And we would get two loads, two tankers a
11 week out of there, 5,000 gallons.

12 That's got to be the same people,
13 because -- I know it was W.-something. I just
14 couldn't place the rest of it. But that would have
15 to be the place in Rockford.

16 Q Okay. How about William Wrigley Company?
17 Were they a customer?

18 A Who?

19 Q William Wrigley, the chewing gum company.

20 A If they did, they must have -- unless they
21 brought it there themselves, I don't remember ever
22 pulling none of their stuff.

23 Q Okay. How about Warner Electric?

24 A I don't remember getting nothing from them,

1 either.

2 Q Do you recall Warwick Electronics?

3 A No.

4 Q How about Wilson Sporting Goods?

5 A No.

6 Q Do you recall Witco Chemical Company?

7 A Who?

8 Q Witco?

9 A No.

10 Q How about Wyco Tool?

11 A Uh-uh.

12 Q How about Wycoff Steel Company?

13 A Ain't that the one on 37th and Kedzie?

14 Q 3200 South Kedzie. Is that the one?

15 A Yeah. That's the one earlier where I got
16 all the acid from.

17 MR. DECKER: What's the name? Wycoff?

18 MR. KOWALSKI: Wycoff, W-y-c-o-f-f.

19 BY MR. KOWALSKI:

20 Q And you hauled acid out of there?

21 A Yeah.

22 Q Do you recall how much?

23 A Yeah. We would get four loads a week,
24 because we cleaned out a tank there, too.

1 Q And what was the size of those loads?

2 A 5,000 gallons. That was another one of
3 them stops where you had to string out a bunch of
4 hose.

5 Q Do you recall hauling for Xerox
6 Corporation?

7 A Xerox? Yeah. They located at -- what do
8 you call that? What the hell do you call that
9 little town? That's down on the 22nd Street Plaza
10 right off the toll road there. What is that? It
11 ain't McCook. What would it be? Brookfield or
12 something?

13 Q Okay. And what did you haul out of there?

14 A Thinner. That was a smaller stop. I'd say
15 we'd never get over 15, 20 drums at a time.

16 Q That would be 15 to 20 drums per week?

17 A Yeah.

18 Q Do you recall a customer called Wheting or
19 Wheting Corporation in Harvey? 157th and Lathrop?

20 A Name the company again.

21 Q Wheting, Wheting?

22 A We had a customer out there. I went there,
23 but I wouldn't swear that's it. It sounds like the
24 same location.

1 Q What did you pick up there?

2 A We was hauling some acid out there. Now,
3 it sounds -- the name sounds about right, and the
4 location sounds about right. The place I'm talking
5 about, I can go to it, but I wouldn't swear that the
6 name's going to be the name. It could be.

7 Q All right. Do you recall a customer called
8 Wilson & Company at Plumber and Wentworth in Calumet
9 City?

10 A Where about in Calumet City?

11 Q Plumber and Wentworth?

12 A No, I don't remember that.

13 Q How about a customer called Ferro
14 Engineering, also in Calumet City?

15 A No, I don't remember them.

16 Q Do you recall hauling for Bulk Terminal
17 Transport?

18 A Yeah, I remember that.

19 Q What did you haul for them?

20 A See, I don't know what you would call it.
21 That was a tanker outfit, and they would wash the
22 tanks, steam clean the tanks and have water run into
23 a pit, and we'd run it out of there.

24 MR. DECKER: What's the name of it?

1 MR. KOWALSKI: Bulk Terminal Transport.

2 BY MR. KOWALSKI:

3 Q Do you recall where that was located?

4 A Where they located at? I would say about
5 123rd -- see, we at 122nd. About 100 -- between
6 100 -- 125th and Cottage Grove. Not cottage grove,
7 Stony Island.

8 Q Stony Island?

9 A Yeah. They're right in the back of the
10 Ford plant.

11 Q How much did you take out of there?

12 A I'd say we got a tank a week out of there,
13 about 5,000 gallons.

14 Q Do you recall a customer called
15 Accutronics?

16 A No.

17 Q How about Acme Steel Company?

18 A No, I don't remember that, neither.

19 Q Active Service?

20 A No.

21 Q Advanced Transformer?

22 A No.

23 Q Alco-Gravier?

24 A No.

1 Q Allis Chalmers?

2 A Yeah, Allis Chalmers I remember.

3 Q Do you recall where they were located?

4 A Allis Chalmers? Let's see. Around 151st,
5 right off of Harlem.

6 Q And what did you haul out of there?

7 A Waste oil -- they call it cooling oil, oil
8 they use to cool the machine when they were drilling
9 and cutting.

10 Q And how much did you haul out of there?

11 A Well, we got about -- I'd say about three
12 loads a week; but we'd never get a full 5,000
13 gallons at a time, because they had like a 4,000
14 gallon storage tank. So, let's say we got about
15 12,000 gallons a week out of there.

16 Q Do you recall a customer called American
17 Name Plate?

18 A American Name Plate? Yeah, I was there.
19 Now, where they located is the big problem. I ain't
20 gonna tell you where they're located, because I
21 don't remember where they're located. I remember
22 going there, but the location --

23 Q Was it in Chicago?

24 A I think so. Northwest, it should be.

1 Q What did you pick up there?

2 A It had to be drums. And their like a
3 normal would be about 60 drums a week.

4 Q And what was in the drums?

5 A Thinner.

6 Q Do you recall a customer called Anderson
7 Manufacturing in Michigan City?

8 A Michigan City, Indiana? Yeah, I was there
9 several times.

10 Q What did you pick up there?

11 A That was thinner in drums, and each time I
12 went I got 80 drums, so I don't figure I went over
13 once a week.

14 Q Was that taken to 9th Avenue, or was that
15 taken to U.S. Scrap?

16 A That was taken to Paxton. That was -- that
17 went into the -- see, when we moved into Paxton,
18 they had the incinerator there. See, that actually
19 wasn't -- that stuff was hauled by us, but it was
20 hauled for the incinerator. See, who had that
21 incinerator, I forget the name of the outfit that
22 had that -- see, when we moved, that had to be about
23 '79 and '80.

24 Q Do you recall hauling for Anderson before

1 that when you were still at U.S. Scrap?

2 A No, no. No, this here had to be for that
3 incinerator.

4 Q You're talking about the S.C.A.
5 incinerator?

6 A Yeah.

7 Q All right. Do you recall a customer call
8 APPCO Metal?

9 A No.

10 Q How about Armstrong Chemicals?

11 A Armstrong Chemicals? Yeah. The location,
12 I can't tell you.

13 Q Do you recall what you hauled for them?

14 A I would say we was pulling thinner out of
15 there, too.

16 Q How much?

17 A I'd say about two loads a week at 5,000
18 gallons.

19 Q Do you recall a customer called Avon?

20 A Avon? That's -- Avon. Um-um.

21 Q No?

22 A I don't remember where they are.

23 Q How about B & J Plastics Manufacturing?

24 A I can't remember them, B & J Plastics.

1 Q Betz Laboratories?

2 A Who?

3 Q Betz Laboratories?

4 A No, I don't remember that one either.

5 Q How about Calumet Screw Machine?

6 A Nope.

7 Q Cellofilm?

8 A No.

9 Q Central Scientific?

10 A No.

11 Q Chem Trust?

12 A No.

13 Q Chicago Adhesive?

14 A Yeah, I was there, but -- let's see. That

15 was a drum stop, too. That was -- we got -- I'd get

16 something like 80 drums a week out of that place.

17 Q Do you know what was in the drums?

18 A Well, I would say it would have been like

19 thinner and varnish, waste varnish, some mixed up

20 stuff.

21 Q How about a customer called Chicago Metals?

22 A No.

23 Q Chicago Rotoprint?

24 A No, I never was there, either.

1 Q Commercial Solvents?

2 A No.

3 Q Continental Cleaning?

4 A Nope.

5 Q Contour Saws?

6 A Nope.

7 Q Cook County Hospital?

8 A Nope.

9 Q Koroname?

10 A No.

11 Q Cuneo Solvents?

12 A No.

13 Q Custom Metals?

14 A No.

15 Q Delaware Plastics?

16 A No.

17 Q Desa or Desa Industries in Park Forest?

18 A No.

19 Q Dublin Company?

20 A No.

21 Q Dutone?

22 A Nope.

23 Q Elgin Machine?

24 A Nope.

1 Q Federal Tool & Plastics?

2 A No.

3 Q Frank Currau Company?

4 A Who?

5 Q Frank Currau Company?

6 A No, I don't remember them, either.

7 Q Gard Industries?

8 A Nope, I don't remember that one.

9 Q Handschy Chemical?

10 A Nope.

11 Q Hausner Hard Chrome?

12 A Who?

13 Q Hausner Hard Chrome?

14 A No, I don't remember that one, either.

15 Q Heat Bath Corporation?

16 A Nope.

17 Q Hooker Glass?

18 A Nope.

19 Q SMF, Incorporated?

20 A I don't remember that one either.

21 Q Inland Steel Company?

22 A Inland Steel? No, I don't remember that.

23 Q Jataglio Service?

24 A No.

1 Q J & S Jin Mill?
2 A No.
3 Q John L. Armitage?
4 A No, I don't remember that one.
5 Q Liquid Dynamics?
6 A Liquid Dynamics? I don't remember that
7 one, either.
8 Q KMS?
9 A No.
10 Q Lisner?
11 A Lisner? No.
12 Q Luminous Ceiling?
13 A No.
14 Q Mass & Waldstein?
15 A No.
16 Q Marvel Metal?
17 A Nope.
18 Q Metal Industry?
19 A Nope.
20 Q Metal Reclaiming?
21 A Nope.
22 Q Midwest Electrics?
23 A Midwest Electrics? I don't remember that
24 one, either.

1 Q How about Mirror Reflector Service Company?

2 A I remember them, and they in -- what, Elk
3 Grove Village or Bensenville, somewhere up in there?

4 Q I'm not sure. Do you recall what you
5 picked up there?

6 A Yeah. That was drums we used to haul out
7 of there.

8 Q How many?

9 A Oh, I'd say about -- about 80 drums a week.

10 Q Do you know what was in the drums?

11 A Thinner.

12 Q Do you recall a customer called Modine
13 Manufacturing?

14 A Nope, I don't remember that one.

15 Q How about Moffet Technical Center?

16 A Nope.

17 Q National Bronze?

18 A Nope.

19 Q National Celofilm?

20 A Nope.

21 Q Northwest Salvage?

22 A No.

23 Q Northwest Screen Print?

24 A Nope.

1 Q Northwestern University?

2 A Nope.

3 Q How about Owens-Corning or Owens-Illinois?

4 A Nope.

5 Q Paisley Products?

6 A No.

7 Q Penray?

8 A No.

9 Q Pauncher Industries?

10 A Nope.

11 Q Preheler Electrical?

12 A No, I don't remember that one, either.

13 Q Rockola Manufacturing?

14 A No.

15 Q Rohn & Hass?

16 A Nope.

17 Q Roll Print Packaging?

18 A Nope.

19 Q St. Charles Manufacturing?

20 A No.

21 Q Sherwin Williams?

22 A Nope. Never pulled none of that.

23 Q Stenograph?

24 A Nope.

1 Q Transport Service?

2 A Nope.

3 Q Western Community?

4 A Nope.

5 Q Young Spring & Wire?

6 A Yep. That was acid.

7 Q Where were they located?

8 A Hum?

9 Q Do you recall where they were located?

10 A In -- let's see. Where are they located
11 at? Young -- I forgot the location.

12 Q Do you recall how much you hauled from
13 there?

14 A Let's see. Young Spring & Wire. I think
15 it was something like -- I'd say about four loads a
16 week, 5,000 gallons. That was an acid outfit, too.

17 Q Do you recall a customer called Technical
18 Products?

19 A No.

20 Q How about SMF, Incorporated?

21 A No.

22 Q Just so that I have it clear, Mr. Brown,
23 all of these companies that we've been talking
24 about, their waste could have gone to either the

1 U.S. Scrap site or the 9th Avenue site, is that
2 correct?

3 A Yep.

4 Q You yourself only took it to 9th Avenue on
5 several occasions?

6 A Yeah. Well, that was just like some of the
7 other stops you've got there. Some of them other
8 drivers could have picked it up, but I don't
9 remember going to them, you know. You know, in fact
10 that hospital stuff, we did have a driver with a
11 roll-out that went to a lot of small stops. And
12 some of them stops you was asking about, I don't
13 know. They had to be small stops where I never went
14 to.

15 Q You, being one of the more senior drivers
16 there, would have your choice of stops and would
17 have regular stops, is that right?

18 A Yeah. And from '73 on -- see, from -- I'd
19 say from '62 up until about 1971, '72, I was the
20 only -- I was the only trailer man. Then they had
21 another guy that had the roll-out. And then '73,
22 that's when they really got big into chemicals, and
23 that's when he started the high, and that's when I
24 went in the tanker. From '62 to '73.

1 Then we had all that stuff like American
2 Can, Continental Can. Then in '73, he really went
3 with the liquid. That's when he hired all the new
4 drivers. And by me being the oldest man, I got the
5 vacuum tank, and I started picking my stops. But
6 then they cut my hours down.

7 MR. KOWALSKI: Okay. Those are all the
8 questions I have for you Mr. Brown. Thank you.

9 Signature?

10 MR. DECKER: Why don't you you present it.
11 We'll take a look at it.

12 MR. KOWALSKI: Okay. Signature will be reserved
13 then.

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1 UNITED STATES
2 ENVIRONMENTAL PROTECTION AGENCY
3 REGION V

4 IN THE MATTER OF:)

5 U.S. SCRAP CORPORATION,)
6 Chicago, Illinois,)

7 -and-)

8 9TH AVENUE DUMP,)
9 Gary, Indiana.)

10 I, LEROY BROWN, state that I have read the
11 foregoing transcript of the testimony given by me at
12 my deposition on the 9th day of September, 1988, and
13 that said transcript constitutes a true and correct
14 record of the testimony given by me at said
15 deposition except as I have so indicated on the
16 errata sheets provided herein.

17 _____
18 LEROY BROWN

19 No corrections (Please initial) _____
20 Number of errata sheets submitted _____ (pages.)

21 SUBSCRIBED AND SWORN TO
22 before me this _____ day
23 of _____, A.D., 1988.

24 _____
Notary Public

1 STATE OF ILLINOIS)
) SS:
2 COUNTY OF W I L L)

3
4 I, CHARLES R. ZANDI, CSR, a notary
5 public in and for the County of Cook and State of
6 Illinois, do hereby certify that LEROY BROWN was by
7 me first duly sworn to testify to the truth, the
8 whole truth, and nothing but the truth, and that the
9 above deposition was recorded stenographically by me
10 and reduced to typewriting by me.

11
12 I FURTHER CERTIFY that the foregoing
13 transcript of the said deposition is a true,
14 correct, and complete transcript of the testimony
15 given by the said witness at the time and place
16 specified hereinbefore.


17
18 I FURTHER CERTIFY that I am not a
19 relative or employee or attorney or counsel of any
20 of the parties, nor a relative or employee of such
21 attorney or counsel, or financially interested
22 directly or indirectly in this action.

23

24

1 I FURTHER CERTIFY that my certificate
2 annexed hereto applies to the original and typed
3 transcripts only, signed and certified transcripts
4 only. I assume no responsibility for the accuracy
5 of any reproduced copies not made under my control
6 or direction.

7
8 IN WITNESS WHEREOF, I have hereunto
9 set my hand and affixed my seal of office at
10 Chicago, Illinois, this 21st day of September,
11 A.D. 1988.

12 
13 CHARLES R. ZANDI, CSR
14 188 West Randolph Street
15 Chicago, Illinois 60601
(312) 984-1033

16 C.S.R. License No. 84-3058.

17 My notary commission
18 expires July 19, 1992.
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